

House of Commons  
Environmental Audit Committee

**PESTICIDES:  
THE VOLUNTARY  
INITIATIVE**

First Report of Session 2002–03

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First Report of Session 2002–03

*Report, together with  
Proceedings of the Committee,  
Minutes of Evidence and an Appendix*

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## ENVIRONMENTAL AUDIT COMMITTEE

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The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by Her Majesty's Ministers; and to report thereon to the House.

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### Footnotes

In the footnotes of this Report, references to oral evidence are indicated by 'Q' followed by the question number. References to written evidence are indicated by the page number as in 'Ev 12'.

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## FIRST REPORT

**The Environmental Audit Committee has agreed to the following Report:**

### **PESTICIDES: THE VOLUNTARY INITIATIVE**

#### **LIST OF CONCLUSIONS AND RECOMMENDATIONS**

- 1. The objectives of the Voluntary Initiative lack clarity in the extent to which they include a reduction in pesticide use as an explicit aim (para 10).**
- 2. Progress on the development of Crop Protection Management Plans is almost a year behind schedule. This is disappointing. The 2006 target—a 30 per cent uptake—is also insufficiently challenging as evidence suggests that very high levels of take-up are required for the Initiative to be successful (para 17).**
- 3. We fear that Crop Protection Management Plans may become little more than a paper exercise, and add nothing to requirements already contained in other assurance and subsidy schemes (para 19).**
- 4. The Initiative lacks a clear implementation strategy to provide incentives for farmers to alter their behaviour and take-up best practice (para 25).**
- 5. We are forced to conclude that the Voluntary Initiative does not appear to have, within itself, sufficient ‘carrots’ to offer to farmers. Nor can it enforce its recommendations with ‘sticks’ while remaining on a voluntary basis (para 26).**
- 6. We doubt whether the Voluntary Initiative can deliver the very high levels of take-up which will be needed for success. We believe that incentives will have to come from outside the Initiative. Cross-compliance with Common Agricultural Policy subsidy schemes, with their audit arrangements to ensure compliance, could provide one of the mechanisms for encouraging widespread adoption which the Voluntary Initiative itself lacks (para 27).**
- 7. We recommend that the Government develops an environmental management strategy for agriculture which sets out the relative contributions and interrelationships between the Initiative, assurance schemes, and both existing and proposed agri-environmental schemes. Farming desperately needs a simpler approach (para 28).**
- 8. The original 28 targets set as part of the Voluntary Initiative relate mainly to processes rather than environmental outcomes, but are nevertheless important. They are challenging and, as the example of the professional register of spray operators shows, the signatories appear to have underestimated the task of achieving them (para 31).**
- 9. We endorse the efforts of the Steering Group, in response to pressure from the Minister, to develop a more comprehensive set of indicators and targets. We are concerned, however, that—more than 18 months into the initiative—these have still not been finalised (para 35).**
- 10. We recommend that the Government clarifies the criteria it intends to use to assess the effectiveness of the Initiative immediately (para 36).**
- 11. We consider it essential that the Steering Group should monitor progress of the Initiative against the approved targets, notwithstanding any other targets or**

indicators it might set. The next annual report must set out clearly progress in this respect. It should also contain analysis of progress against any other targets which have subsequently been agreed with Ministers (para 40).

12. At present, little detailed information is available about the costs which signatories claim to have incurred. We recommend that there should be far greater transparency and accountability with regard to such costs, and that this information should be included in the annual report (para 39).
13. The extent to which claimed expenditure by the signatories constitutes 'real' costs over and above any costs which they would otherwise have incurred, even in the absence of the Initiative, should be made clear (para 41).
14. We were alarmed to hear that Professor Dent is only contracted to work for eight days a year as independent Chairman of the Voluntary Initiative Steering Group (para 43).
15. The department must clearly put its money where its mouth is, if its miserly approach is not to be seen to reflect the extent of its commitment to the Initiative (para 43).
16. We also find it bizarre and deplorable that Department for Environment, Food and Rural Affairs had commissioned a review of the success of the Voluntary Initiative without even having the courtesy to inform Professor Dent (para 44).
17. The Government initially made much of the "partnership" approach it was to pursue with regard to the Voluntary Initiative. But any such claim now is clearly untenable. Department for Environment, Food and Rural Affairs has failed to engage in any serious dialogue with the Steering Group on cross-cutting issues, and has even undermined the role and authority of its Chairman. The evidence provided to us showed that the Chairman and Steering Group are isolated—and indeed alienated—from Government and the relevant department (para 46).
18. We came to the following overall conclusions:
  - (a) The Voluntary Initiative has got off to a rather slow start. It has so far had little impact on farmers as much of the work done to date has involved preparation and groundwork. The Initiative is now beginning to be rolled out to farmers and the next year will be critical.
  - (b) We are, however, very concerned that the Voluntary Initiative does not have within itself sufficient incentives to ensure the high level of take-up required. Nor, being voluntary, can it require farmers to change their behaviour. In addition, there is little emphasis within the Initiative on reductions in the use of pesticides and on encouraging alternative approaches.
  - (c) On the other hand, it is perhaps too early to judge whether the Voluntary Initiative has been a success. We therefore consider that it needs to be given further time, and that at the end of 2003 a thorough and realistic appraisal of its success should be carried out.
  - (d) But it is already clear that the Voluntary Initiative should represent only one aspect of a more comprehensive strategy towards reducing the environmental impacts of pesticides. Moreover, many of the activities within the Initiative

would need to be carried out in any event as part of an overall strategy, and will depend for their effectiveness on the adoption of a joined-up approach.

- (e) **The Government must therefore, as a matter of urgency, develop and publish a pesticides strategy. Such a strategy should show how different policy instruments—including the use of fiscal instruments, a strong regulatory framework, the Voluntary Initiative itself, and cross-compliance with subsidy and assurance schemes—are to be used to complement each other and achieve a reduction in the environmental impacts of pesticides. Indeed, there is a widespread consensus, reflected in research studies and the evidence presented to us, that reliance on a single policy measure to achieve any environmental objective is unlikely to be successful, and that a combination of policies are generally required.**
- (f) **We believe that fiscal instruments have an important part to play in such a strategy. They could provide, through hypothecation, far more resources than are currently available within the Voluntary Initiative. They could be designed to provide rebates to farmers who adhered to more stringent environmental guidance; and to discriminate much more heavily on products in relation to the extent of environmental damage they cause. However, as we highlighted nearly three years ago, the Treasury and Department for Environment, Food and Rural Affairs need to undertake more research in this area to prepare for the introduction of practical proposals. They must do so now.**
- (g) **The Government is currently considering major issues relating to agricultural policy - both in its response to the Policy Commission on the Future of Farming and Food and in relation to the EU mid-term review of the Common Agricultural Policy. It will be releasing a sustainable agriculture strategy very shortly. This would provide a context within which our recommendations in this report can be taken forward (para 48).**

## PESTICIDES: THE VOLUNTARY INITIATIVE

### INTRODUCTION

1. In 1997, the new Government came into office with a strategy to pursue sustainable development through a programme of environmental tax reform. The object was to shift over time the balance of taxation from 'goods' to 'bads' in accordance with the 'polluter pays' principle.<sup>1</sup> The Government commissioned research and reviews to examine the scope for introducing environmental taxes,<sup>2</sup> and during the last Parliament it took forward proposals in three areas—pesticides, aggregates, and energy. In two of these—aggregates and energy—environmental taxes have now been introduced.<sup>3</sup>

2. In the case of pesticides, the Government's decision to adopt a 'partnership' approach with the industry instead of a tax provoked an exchange of correspondence between ourselves and the Treasury.<sup>4</sup> When the Financial Secretary of the Treasury appeared before us in January 2000, he stated that industry proposals for a voluntary approach had only just been received and would require considerable analysis before coming to a decision. We were therefore astonished when the Prime Minister announced barely two weeks later that the Government had decided not to introduce a pesticides tax.<sup>5</sup>

3. The speed of this announcement demonstrated that the decision was made on political grounds at the highest level in the light of the economic hardship the farming industry was facing. There was clearly little opportunity for any analysis and consultation with departments, some of which we suspect might have been rather more cautious about the effectiveness of a partnership approach.

4. The Government subsequently released the industry's formal proposals for consultation, and in October 2000 the industry submitted a revised set of proposals which took account of some of the concerns raised. At the same time, the Government commissioned a consultancy review of the proposals and the likely effectiveness of the voluntary approach.<sup>6</sup> A third revision of the proposals was put forward by the industry in February 2001 and finally approved by the Government the following month.<sup>7</sup>

5. The Voluntary Initiative, as it was later called, represents a formal agreement between the Government and the farming industry. Those organisations which have signed the agreement—'the signatories'—consist of the main industry trade group, the farming unions, and several smaller trade bodies. The signatories bear responsibility for implementing the agreement. There is also a Steering Group, composed of representatives of the signatories and certain other organisations including environmental agencies and NGOs. The Steering Group is chaired by an independent Chairman, Professor Barry Dent, who reports on progress to the Minister for the Environment every six months. The Minister appointed

<sup>1</sup> HM Treasury, Statement of Intent on Environmental Taxation, July 1997.

<sup>2</sup> eg (i) *Economic Instruments and the Business Use of Energy, A report by Lord Marshall*, 1998; (ii) *Design of a Tax or Charge Scheme for Pesticides*, Ecotec, 1999.

<sup>3</sup> As part of its regular series of inquiries on the Government's Budget and Pre-Budget Reports and the progress being made against the Statement of Intent, the Environmental Audit Committee considered in detail these three areas in its Fourth Report, *The Pre-Budget Report 1999: Pesticides, Aggregates and the Climate Change Levy*, HC 76, 1999-2000. Subsequent Committee reports include additional comments: see Fifth Report, *Budget 2000 and the Environment*, HC 404, 1999-2000; and Second Report, *Pre-Budget Report 2001: A New Agenda?*, HC 363, 2001-02.

<sup>4</sup> EAC *Pre-Budget Report 1999: Pesticides, Aggregates and the Climate Change Levy*, HC76-II, 1999-2000, Ev 233  
<sup>5</sup> *idem*, HC 76-I, 1999-2000, para 12.

<sup>6</sup> *The Potential Cost and Effectiveness of Voluntary Measures in Reducing the Environmental Impact of Pesticides*, DEFRA, February 2002. Although not published until 2002, the study was carried out in late 2000.

<sup>7</sup> The approved proposal (hereafter referred to as the Voluntary Initiative approved proposal) can be found on the Voluntary Initiative web site at: <http://www.voluntaryinitiative.org.uk/Content/Programme.asp>.

Professor Dent as Chairman in August 2001, and the first meeting of the Steering Group took place on 21 September 2001.

<b>Voluntary Initiative Steering Group Members<sup>8</sup></b>	
<b>Signatories</b> Crop Protection Association National Farmers Union National Farmers Union of Scotland Ulster Farmers Union Country Land and Business Association National Association of Agricultural Contractors UK Agricultural Supply Trade Association Agricultural Engineers Association	<b>Environmental / Other</b> English Nature Environment Agency Royal Society for the Protection of Birds Friends of the Earth Water UK Pesticides Action Network UK LEAF Scottish Environment Protection Agency Assured Food Standards WWF-UK

6. The aim of the Voluntary Initiative is to encourage farmers to use pesticides more effectively and with greater awareness of the environmental impacts of their actions. It is due to run for 5 years (until March 2006) when its success will be evaluated. However, the Financial Secretary of the Treasury has continued to insist that a pesticides tax is still on the agenda if the Voluntary Initiative is seen to be failing.<sup>9</sup>

7. In view of the fact that the Voluntary Initiative has now been in place for over 18 months, we considered it appropriate to evaluate the progress being made. We took evidence from members of the Steering Group, including both signatories and environmental organisations, and from the independent Chairman, Professor Dent. We also received an unpublished paper from the Friends of the Earth.<sup>10</sup>

### **Aims and objectives**

8. The Government's policy objective with regard to pesticides is to minimise the adverse environmental impact of their use, consistent with adequate crop protection.<sup>11</sup> But this goes rather wider than the Voluntary Initiative itself, as it includes the activities of other bodies involved in approving and regulating pesticides.<sup>12</sup> The Voluntary Initiative approved proposal states that "In developing our package of measures, the overall objective has been to reduce the environmental effects of pesticide use and to improve the biodiversity of arable farmland. We believe that this can be achieved by working closely with farmers, land owners, pesticide users and others to best ensure that they also understand and address these issues".<sup>13</sup>

9. The evidence presented to us revealed that there was a significant disparity of views over the aims of the Voluntary Initiative. The signatories denied that a reduction in pesticide use was an explicit objective and emphasised instead that the key issue was the efficiency and effectiveness of application.<sup>14</sup> Environmental organisations, however, supported the principle that a reduction in pesticide use was desirable and should be a specific outcome of the Initiative. They also expressed concern that the Voluntary Initiative laid insufficient

<sup>8</sup> Representatives from several government departments and from the devolved administrations attend as observers.

<sup>9</sup> Eg Environmental Audit Committee, *Pre-Budget Report 2001: A New Agenda*, HC 363-I, 2001-02, paragraph 18.

<sup>10</sup> EV35.

<sup>11</sup> *Budget 2002*, HM Treasury, April 2002, HC 592, 2001-02, paragraph 7.78.

<sup>12</sup> eg the Advisory Committee on Pesticides, and the Pesticides Safety Directorate.

<sup>13</sup> *op.cit.* summary, page 5.

<sup>14</sup> Q11.

emphasis on alternative methods of crop management; and that indeed there was insufficient knowledge about the indirect effects of pesticide use on non-target species.<sup>15</sup>

10. We appreciate that measuring the environmental impacts of pesticide use is complex, and cannot simply be done by measuring the overall weight of substances applied. Our previous report examined this issue in greater depth.<sup>16</sup> However, it appears to us that greater efficiency in the use of pesticides must logically result either in a reduction in pesticide use or in a greater amount of pesticides being applied to the target crops. We were unclear what position the signatories were taking on this issue, but Mr Kinnaird at any rate acknowledged that the scope for reductions was huge.<sup>17</sup> In our view, **the objectives of the Voluntary Initiative lack clarity in the extent to which they include a reduction in pesticide use as an explicit aim.**

### Progress

11. The Voluntary Initiative consists of 27 individual projects. They focus largely on procedural aspects—the research and implementation of best practice in sprayer application. Three of these projects were felt to be of such overriding importance that they underpinned the development of the rest. These ‘three pillars’ as they were termed in the approved proposals are:

a baseline survey of current farm sprayer practice;

the development and implementation of crop protection management plans; and

the appointment of a biodiversity officer within the Crop Protection Association and the development of a biodiversity network.

12. The first ‘pillar’ of the Voluntary Initiative was the need to conduct a thorough survey of current sprayer application practices. Information in this area was lacking, and the survey would provide a baseline against which some aspects of progress on the Voluntary Initiative could be measured. It would also provide important information required for developing other projects in the Voluntary Initiative. The survey was contracted out to the Central Science Laboratory, an agency of DEFRA. It involved 402 farm visits, and a postal survey of a further 374 farms. It covered aspects such as agronomic advice, the extent of operator training, the age and condition of spraying machinery used, cleaning of sprayers, and disposal of waste packaging etc. The survey was completed in March 2002.<sup>18</sup>

13. The farm sprayer application survey is a welcome development, though we are surprised no such survey has been carried out before. The survey is due to be repeated in year 4 of the Initiative and may enable some assessment of its effectiveness. However, it did not address the potential for reduction in the use of pesticides. In our view, the absence of such information will undermine an assessment of the effectiveness of the Initiative.

14. Requirements for Crop Protection Management Plans (CPMPs), the second crucially important ‘pillar’ of the agreement, were to have been drawn up by early 2002. The plans should have been trialled on farms on a pilot basis during the summer, so that revised

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<sup>15</sup> Ev 12, 15, 20. A reduction in pesticide use is also seen as a vital objective by Water UK: see Ev 22.

<sup>16</sup> Fourth Report of the Environmental Audit Committee, *Pre-Budget Report 1999: Pesticides, Aggregates and the Climate Change Levy*, HC 76, 1999-2000 (hereafter referred to as EAC 1999).

<sup>17</sup> Q 13. Previous studies have estimated that the scope of cost-effective reductions in pesticide use may range between £100 million and £274 million a year. See EAC 1999, paragraph 21.

<sup>18</sup> *A Survey of Current Farm Sprayer Practices in the United Kingdom*, Central Science Laboratory, March 2002.

requirements could be issued in autumn 2002.<sup>19</sup> The Voluntary Initiative approved proposal contains a target that 30 per cent of arable land should be under such plans by 2006.<sup>20</sup>

15. A short paper prepared for the September 2002 meeting of the Steering Group states that “throughout the summer discussions have continued with interested parties on the scope and style of the Voluntary Initiatives’ Crop Protection Management Plans with no real consensus emerging other than recognising that...there are significant overlaps with APS, ACCS, RPA's farm audit, LEAF's and Sustainable Farming Co.'s crop protection management plans”. It goes on to state that 75 per cent of the likely questions in a crop protection management plan would be addressed (and compliance verified) by these schemes.<sup>21</sup>

16. In his September 2002 report to Ministers, Professor Dent stated “I continue to have concerns over the development of the Crop Protection Management Plans. This pillar is being lead by the National Farmers Union. Unexplained delays have occurred although an agreed draft plan was presented to the Steering Group on the 4 September”. But he expected that, as the basis for the Crop Protection Management Plans had now been agreed, significant progress would ensue.<sup>22</sup> This sentiment was supported in the oral evidence given by the signatories.<sup>23</sup>

17. Given that the scope and content of CPMPs have only now been agreed, it will be impossible to pilot them more extensively until summer 2003. **Progress on the development of Crop Protection Management Plans is almost a year behind schedule. This is disappointing. The 2006 target—a 30 per cent uptake—is also insufficiently challenging as evidence suggests that very high levels of take-up are required for the Initiative to be successful.**<sup>24</sup>

18. The Policy Commission on the Future of Farming and Food reported in January 2002 on a strategy for a sustainable future.<sup>25</sup> An important recommendation of that report was that the Government should introduce a ‘broad and shallow’ agri-environment scheme to provide incentives to farmers to manage their land in an environmentally sensitive way. The existing agri-environment schemes provide such incentives but only to a limited number of farmers.<sup>26</sup> The proposed broad and shallow scheme would apply to all farmers, and would also provide an opportunity to rationalise existing schemes within such a framework. It would involve the development of farm management plans and audit arrangements, thus further complicating the bureaucratic requirements to which farmers are subject.

19. We remain concerned about the extensive overlaps with a wide range of other schemes, including voluntary assurance schemes and existing agri-environmental subsidy schemes. These have made it difficult to achieve a consensus on the approach to be adopted. Moreover, the introduction of a broad and shallow agri-environment scheme, as recommended by the Policy Commission on the Future of Farming and Food, may undermine further efforts to promote the Voluntary Agreement through its own distinctive initiative in this area. **We fear that Crop Protection Management Plans may become**

<sup>19</sup> See project proposal at [http://www.voluntaryinitiative.org.uk/Attachments/243\\_101CMS.doc](http://www.voluntaryinitiative.org.uk/Attachments/243_101CMS.doc).

<sup>20</sup> Voluntary Initiative approved proposal, Feb 2001, page 11.

<sup>21</sup> See Voluntary Initiative paper at: [http://www.voluntaryinitiative.org.uk/Attachments/230\\_101CMS.doc](http://www.voluntaryinitiative.org.uk/Attachments/230_101CMS.doc).

<sup>22</sup> Second monitoring report from the Chairman of the Voluntary Initiative Steering Group to the Minister, September 2002.

<sup>23</sup> Ev 3, QQ 22-23, 30.

<sup>24</sup> Q60. Cf the DEFRA/EFTEC Study which commented that the “potential advantage of voluntary agreements, ie. Targeting them directly to key environmental impacts, can only be realised if the uptake of the measure by the target audience is high.

<sup>25</sup> *Farming and Food: A Sustainable Future*, Policy Commission on the Future of Farming and Food, January 2002.

<sup>26</sup> The two major agri-environment schemes are Environmentally Sensitive Areas (where eligibility is restricted to those in certain designated areas) and Countryside Stewardship (where subsidies are cash limited on a “discretionary” basis.).

**little more than a paper exercise, and add nothing to requirements already contained in other assurance and subsidy schemes.**

20. The appointment of a biodiversity officer, the third pillar of the Initiative, should have been made by July 2001 but did not actually take place until December 2001 – some 5 months late.<sup>27</sup> The signatories told us that a biodiversity network had now been created, and the Crop Protection Association provided us with their new biodiversity strategy.<sup>28</sup> The impact that this may have yet to emerge.

21. With regard to the overall progress being made on the remaining 24 projects which constitute the Voluntary Initiative, Professor Dents' latest monitoring report stated that seven of the projects were late. However, the signatories were confident that the majority of these were now back on track.<sup>29</sup>

### **Incentivisation**

22. While some of the projects within the Voluntary Initiative might help farmers without imposing significant overheads (eg better labelling of products, providing environmental information sheets on products etc), many will require substantial changes in behaviour (eg attending training courses, carrying out regular inspections of spraying machinery etc). Farmers will have to invest extra time, and sometimes money, without any obviously discernible reward. We were therefore interested in how the signatories were proposing to 'incentivise' the Initiative.

23. One possible motivation for farmers is the avoidance of a pesticide tax, and the Steering Group has been keen to 'brand' the Initiative, and the various projects within it, as an alternative to a tax. Indeed, some of the publicity information distributed to farmers refer to the Initiative as "possibly the last chance to avoid a pesticides tax".<sup>30</sup> We were somewhat disappointed at this negative approach and find it difficult to reconcile with the view expressed by the signatories to us that ongoing references to the threat of a tax were unhelpful.<sup>31</sup>

24. In any event, the threat of a tax is unlikely to be enough and it is difficult to see what other carrots or sticks the Initiative can offer to farmers. In their memorandum, English Nature stated that final recommendations on incentivisation had yet to be confirmed: "agreement over a practicable incentivisation scheme and close monitoring of progress against interim targets must be a priority for the Steering Group".<sup>32</sup>

25. The Environment Agency commented critically on progress in this area. "The work of the [incentivisation sub-group] has been poorly focused... An initial report of the group suggested using financial [grants] and regulatory incentives to improve uptake, both of which would no longer make the Initiative voluntary as required by Ministers. There has been inadequate consideration of the more difficult issue of motivating farmers to change practice without the use of such incentives".<sup>33</sup> A final report is still awaited from the Incentivisation group. **The Initiative lacks a clear implementation strategy to provide incentives for farmers to alter their behaviour and take-up best practice.**

<sup>27</sup> First Annual Report of the Voluntary Initiative Steering Group, page 3.

<sup>28</sup> Ev 2, Q 17.

<sup>29</sup> QQ 29-30.

<sup>30</sup> Some of the letters sent out to farmers as part of the pilot water catchment area projects specifically included this phrase.

<sup>31</sup> Ev 3, Q30.

<sup>32</sup> Ev 16.

<sup>33</sup> Ev 13.

26. We discussed at some length with witnesses what incentivisation mechanisms the Voluntary Initiative contained, and whether incentives should come from within the Initiative or from other schemes outside it.<sup>34</sup> We also warmly support the efforts now being made in the six pilot water catchment area projects. **But we are forced to conclude that the Voluntary Initiative does not appear to have, within itself, sufficient 'carrots' to offer to farmers. Nor can it enforce its recommendations with 'sticks' while remaining on a voluntary basis.**

27. **We doubt whether the Voluntary Initiative can deliver the very high levels of take-up which will be needed for success. We believe that incentives will have to come from outside the Initiative. Cross-compliance with Common Agricultural Policy subsidy schemes, with their audit arrangements to ensure compliance, could provide one of the mechanisms for encouraging widespread adoption which the Initiative itself lacks.**

28. **We recommend that the Government develops an environmental management strategy for pesticides which sets out the relative contributions and interrelationships between the Initiative, assurance schemes, and both existing and proposed agri-environmental schemes. Farming desperately needs a more coordinated approach.**

### **Targets**

29. Confusion surrounds the issue of targets and indicators for the Voluntary Initiative. The approved proposal of February 2001 listed 28 targets to be achieved over the 5 year period of the Initiative. All of these relate to processes or activities (eg to ensure that all active sprayers are tested by 2006), though some link more directly to pesticide pollution aspects (eg to collaborate with Water UK and the Environment Agency to form a project group with the aim of targeting catchments that face significant problems). These targets correspond closely to the individual projects which constitute the Initiative. They are set out for reference in the following table.

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<sup>34</sup> QQ 62-63, 67-75.

**Table: Voluntary Initiative Targets**

1. To obtain baseline data on current crop protection practices and equipment that can be used to influence most other decisions within the package. This to be done within one year.
2. To repeat the survey after four years in order to measure changes that have occurred as a result of the implementation process and to feed-back into future actions.
3. To develop crop protection management plans and to have 30 per cent of arable land using these by 2006.
4. To appoint a crop protection industry biodiversity officer, within 4 months, and to establish this person as the key conduit for all biodiversity functions.
5. To provide additional support for research on pesticide handling in order to improve facilities on at least five thousand farms by 2006.
6. To increase commitment, from the crop protection industry, to long-term environmental research through the UK Foresight Programme.
7. To measure current adoption of ICM/IFM methodologies, by 2003, in order to target future activities.
8. To increase industry support for the SAPPPIO LINK programme, within six months, in order to increase the focus on sustainability issues.
9. To provide audited environmental information on 1,000 crop protection products by 2006.
10. To ensure that at least 50 per cent of eligible sprayers are fitted with low-drift nozzles by 2006.
11. To redesign 3,000 product labels (in order to improve clarity) by 2005.
12. To assist in the development of new software to increase environmental awareness for use in a pilot exercise on 300 farms by 2003.
13. To improve the use of crop protection products on all farms through media and awareness campaigns by 2006
14. To collaborate with Water UK and the Environment Agency to form a project group with the aim of targeting 'catchments' that face significant problems.
15. To produce and implement a training resource for crop protection advisers on all environmental issues by 2006.
16. To produce and deliver a basic training resource for ALL 'infrequent' users of crop protection products by 2006.
17. To establish a professional register for all spray operators by 2003.
18. To ensure that all 'active' sprayers are tested by 2006.
19. To introduce the use of a code of best practice for the application of sulphuric acid by 2002.
20. To ensure that all agronomist staff working for CPA members have an awareness of environmental issues and are on the BASIS professional register. This to be achieved by 2003.
21. To implement an audit process for environmental training within CPA member companies by 2003.
22. To promote and increase awareness of LERAP requirements by farmers & growers. This to be achieved by 2002.
23. To significantly improve application standards for crop protection products within the amenity sector by 2004.
24. To establish new initiatives to improve and maintain biodiversity in farmland habitats by 2003.
25. To produce a code of practice for the use of insecticides in crop protection by 2004.
26. To complete a national retrieval scheme for 'expired' products by 2004.
27. To complete a life-cycle analysis of crop protection product packaging by 2002.
28. To establish a CPD scheme to improve the competence of farmers making decisions on the use of crop protection products and to have 50 per cent, of those eligible, registered by 2006.

Source: Voluntary Initiative approved proposals, February 2001

30. The Environment Agency commented that “some of these targets, eg that all spray operators should be members of a professional register by 2003, were ambitious and promised a large scale improvement in practice with resultant environmental benefits. They were one of the main reasons why the Agency supported the introduction of the programme as an alternative to a pesticides tax. It has become evident in the process of drawing up success indicators that the signatories are now looking to backtrack on some of these targets since they now realise that they will not be met”.<sup>35</sup>

**31. The original 28 targets set as part of the Voluntary Initiative relate mainly to processes rather than environmental outcomes, but are nevertheless important. They are challenging and, as the example of the professional register of spray operators shows, the signatories appear to have underestimated the task of achieving them.**

32. The approved proposal also identified five indicators by which to measure changes brought about by the Voluntary Initiative.<sup>36</sup> These were to be:

- a new indicator for water quality;
- an indicator for cereal margins under environmental management;
- an indicator of the adoption of new technology in farming;
- an indicator of the training of agronomists; and
- an indicator of the training of operators.

33. Professor Dent explained to us how he had come under some pressure from the Minister to develop targets and indicators to measure the environmental impact of the Initiative.<sup>37</sup> This creates confusion over the basis on which performance is to be monitored, as the Government had already agreed a set of targets in approving the original package. Professor Dent also found it conceptually difficult, as the Steering Committee was being asked to audit the Initiative against targets which it was itself responsible for developing.<sup>38</sup>

34. The solution he had proposed to this dilemma was to base new indicators on the outcome of work already being undertaken by the Pesticides Forum. The latter had already published in 2001 a detailed report highlighting over 50 possible indicators which could be developed or used in order to measure accurately the success of the Forums’ work.<sup>39</sup> On the basis of this work, the Steering Group had drawn up a list of some 17 indicators, together with baseline data for April 2001 and any associated targets. These indicators covered not only process aspects of sprayer application, but also environmental outcome measures. They supersede and effectively include the 5 originally proposed. Importantly, they now include a target for a 30 per cent reduction in detection of pesticides in water. The Steering Group has sent this proposal to the Minister and is awaiting his response.

35. The original targets did not adequately address the direct and indirect effects of pesticides on the environment. **We endorse the efforts of the Steering Group, in response to pressure from the Minister, to develop a more comprehensive set of indicators and targets. We are concerned, however, that—more than 18 months into the initiative—these have still not been finalised.** Even the latest proposals do not include any

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<sup>35</sup> Ev 14.

<sup>36</sup> Voluntary Initiative approved proposal, pages 14-15.

<sup>37</sup> Ev 29-30, Q 101.

<sup>38</sup> *ibid.*

<sup>39</sup> The report can be found at: <http://www.defra.gov.uk/environment/pesticidesforum/outcomes/index.htm> .

indicators for the overall area sprayed, or for the weight and type of substances used - two measures we consider could usefully be included. Indeed, in our earlier report on pesticides, we recommended that there should be far greater disclosure and monitoring of such information.<sup>40</sup>

36. Professor Dent's concern over the influence the Minister has exerted appears justified. This intervention has resulted in confusion as to which targets the success of the Initiative should be measured by. It has also placed the Chairman and the Steering Group in the difficult position of auditing themselves against targets they themselves have set. **We recommend that the Government clarifies the criteria it intends to use to assess the effectiveness of the Initiative immediately.** The absence of such clear criteria is an issue we have ourselves raised with the Treasury on previous occasions.<sup>41</sup>

### Monitoring and resources

37. The Steering Group published its first Annual Report on the Voluntary Initiative in June 2002.<sup>42</sup> We were struck by the absence of any hard monitoring data within that report—either in terms of facts and figures about the use of pesticides and their environmental impacts, or in terms of a formal monitoring of projects against targets and deadlines. Professor Dents' own confidential reports to the Minister do contain brief comments on each project, but even then they do not set out with sufficient clarity performance against targets. While there is very considerable information on the Voluntary Initiative website on individual projects, this is not summarised or brought together in any publicly available form.

**38. We consider it essential that the Steering Group should monitor progress of the Initiative against the approved targets, notwithstanding any other targets or indicators it might set. The next annual report must set out clearly progress in this respect. It should also contain analysis of progress against any other targets which have subsequently been agreed with Ministers.**

39. On the issue of available resources, a pesticides tax had been expected to raise some £130 million a year, and could have been used to finance through hypothecation a substantial programme of research and development of best practice.<sup>43</sup> An important factor in the Governments' decision to approve the Voluntary Initiative, therefore, was the proposed resources which signatories would deliver. These were supposed to amount to £11.9 million over the five year period. In addition, compliance costs of farmers were estimated to be over £11 million a year.<sup>44</sup>

40. Professor Dents' latest monitoring report states that the signatories had spent £2.3 million to date—somewhat less than was anticipated—while costs to farmers have so far been negligible. We note that Professor Dent, however, appears to be reliant on the signatories for estimating such costs, and he suggested that they could do more to improve transparency in this respect.<sup>45</sup> **At present, little detailed information is available about the costs which signatories claim to have incurred. We recommend that there should be far greater transparency and accountability with regard to such costs, and that this information should be included in the annual report.**

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<sup>40</sup> EAC 1999, paragraph 31(a).

<sup>41</sup> eg Second Report of the Environmental Audit Committee, *Pre-Budget Report 2001: A New Agenda?*, HC 363-I, 2001-02, paragraphs 20-21.

<sup>42</sup> [http://www.voluntaryinitiative.org.uk/Attachments/187\\_101CMS.pdf](http://www.voluntaryinitiative.org.uk/Attachments/187_101CMS.pdf).

<sup>43</sup> A tax rate of 30 per cent on annual pesticide sales of £520 million would yield £130 million. The actual yield might be less than this if sales are reduced. See *Design of a Tax or Charge Scheme for Pesticides*, DETR, March 1999, page 11.

<sup>44</sup> Voluntary Initiative approved proposal, page 3.

<sup>45</sup> Q 107.

41. The Crop Protection Association stated that nearly 50 per cent of their staff time was devoted to the Initiative. Given the lack of transparent accounting over costs, it is difficult to reconcile this with their admission that they have not recruited any extra staff, other than the biodiversity officer within Crop Protection Association, to implement the Initiative. **The extent to which claimed expenditure by the signatories constitutes 'real' costs over and above any costs which they would otherwise have incurred, even in the absence of the Initiative, should be made clear.**

### **The 'partnership' approach**

42. In the light of some of our comments above, we are concerned that the roles and responsibilities of the Chairman and the Steering Group were not clearly laid out by the Government at the outset. We also find it extraordinary that, after approving the Voluntary Initiative proposals submitted in February 2001, the Government should have sought to move the goalposts in respect of targets and indicators of success. Moreover, there was a six month delay on the part of the Government in agreeing a name for the initiative, and witnesses told us that this had adversely affected the promotion of the Initiative.<sup>46</sup>

43. **We were alarmed to hear that Professor Dent is only contracted to work for eight days a year as independent Chairman of the Voluntary Initiative Steering Group.**<sup>47</sup> To coordinate and monitor such a large and complex project as the Voluntary Initiative clearly calls for a far greater resource input than this. We appreciate that the actual time Professor Dent has devoted is far in excess of this, and we welcome his refusal to accept any financial support from the signatories.<sup>48</sup> **The department must clearly put its money where its mouth is, if its miserly approach is not to be seen to reflect the extent of its commitment to the Initiative.**

44. **We also find it bizarre and deplorable that Department for Environment, Food and Rural Affairs had commissioned a review of the success of the Voluntary Initiative without even having the courtesy to inform Professor Dent.**<sup>49</sup> Such behaviour is clearly unprofessional. But it is also particularly inappropriate insofar as the independent Chairman is himself responsible for monitoring the progress of the initiative on behalf of the Minister. In commissioning a review, Department for Environment, Food and Rural Affairs are therefore effectively undermining—whether intentionally or not—the role and authority of the independent Chairman. There is also a particular irony in the fact that the department is prepared to spend money on this study, while failing to provide adequate resources for the Chairman himself.

45. More generally, there appears to be a lack of joined-up thinking in Government to produce an array of policies in related areas which will complement and reinforce the Voluntary Initiative. Indeed, a number of the submission we received emphasised the need for the Government to develop a comprehensive strategy which went far wider than the Initiative itself.<sup>50</sup> The development of Crop Protection Management Plans, for example, is closely related to similar requirements in a range of voluntary and departmental schemes. Professor Dent emphasised the complete failure on the part of the department to engage in a dialogue with the Steering Group on such issues.<sup>51</sup> Moreover, he noted with concern how responsibility for the Voluntary Initiative had moved through central sections of Department for Environment, Food and Rural Affairs and now to an agency of Department for

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<sup>46</sup> Ev 3, Q 28.

<sup>47</sup> QQ 93-94 and Ev 35.

<sup>48</sup> Q 95.

<sup>49</sup> Q 92.

<sup>50</sup> Ev 2-3, 15, 18, 22.

<sup>51</sup> Q 90. Cf Q 112.

Environment, Food and Rural Affairs which is based in York.<sup>52</sup> Ministerial responsibility for this policy area has also recently shifted from the Minister of the Environment to the Parliamentary Under-Secretary (Lords).

**46. The Government initially made much of the ‘partnership’ approach it was to pursue with regard to the Voluntary Initiative.<sup>53</sup> But any such claim now is clearly untenable. Department for Environment, Food and Rural Affairs has failed to engage in any serious dialogue with the Steering Group on cross-cutting issues, and has even undermined the role and authority of its Chairman. The evidence provided to us showed that the Chairman and Steering Group are isolated—and indeed alienated—from the department.**

### **Overall strategy and conclusions**

47. Pesticides are a major source of environmental pollution. In our previous report on the subject, we highlighted the large costs of removing pesticides from water supplies, amounting to hundreds of millions of pounds each year, which ultimately fall on consumers. They represent a significant subsidy for intensive agriculture and unfairly discriminate against organic produce.<sup>54</sup> Moreover, there is also considerable concern about the possible indirect environmental impacts of pesticides—about which relatively little information is available.<sup>55</sup> We welcome, therefore, the action being taken to reduce the impacts arising from the use of pesticides.

48. However, the environmental organisations we took evidence from made it quite clear that if take-up by farmers remains poor, the Government should not wait until the end of the Initiative before taking appropriate action.<sup>56</sup> In considering such arguments, **we came to the following overall conclusions:**

- (a) The Voluntary Initiative has got off to a rather slow start. It has so far had little impact on farmers as much of the work done to date has involved preparation and groundwork. The Initiative is now beginning to be rolled out to farmers and the next year will be critical.**
- (b) We are, however, very concerned that the Voluntary Initiative does not have within itself sufficient incentives to ensure the high level of take-up required. Nor, being voluntary, can it require farmers to change their behaviour. In addition, there is little emphasis within the Initiative on reductions in the use of pesticides and on encouraging alternative approaches.**
- (c) On the other hand, it is perhaps too early to judge whether the Voluntary Initiative has been a success. We therefore consider that it needs to be given further time, and that at the end of 2003 a thorough and realistic appraisal of its success should be carried out.**
- (d) But it is already clear that the Voluntary Initiative should represent only one aspect of a more comprehensive strategy towards reducing the environmental impacts of pesticides. Moreover, many of the activities within the Initiative would need to be carried out in any event as part of an overall strategy, and will depend for their effectiveness on the adoption of a joined-up approach. Indeed, there is a widespread consensus, reflected in research studies and the evidence**

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<sup>52</sup> Q 92.

<sup>53</sup> See, for example, *Budget 2000*, HM Treasury, March 2000, paragraph 6.97.

<sup>54</sup> EAC 1999, paragraphs 18-20.

<sup>55</sup> *ibid*, paragraphs 14-17.

<sup>56</sup> Ev 18, 20.

presented to us, that reliance on a single policy measure to achieve any environmental objective is unlikely to be successful, and that a combination of policies are generally required.

- (e) **The Government must therefore, as a matter of urgency, develop and publish a pesticides strategy. Such a strategy should show how different policy instruments—including the use of fiscal instruments, a strong regulatory framework, the Voluntary Initiative itself, and cross-compliance with subsidy and assurance schemes—are to be used to complement each other and achieve a reduction in the environmental impacts of pesticides.**
- (f) **We believe that fiscal instruments have an important part to play in such a strategy. They could provide, through hypothecation, far more resources than are currently available within the Voluntary Initiative. They could be designed to provide rebates to farmers who adhered to more stringent environmental guidance; and to discriminate much more heavily on products in relation to the extent of environmental damage they cause. However, as we highlighted nearly three years ago, the Treasury and Department for Environment, Food and Rural Affairs need to undertake more research in this area to prepare for the introduction of practical proposals. They must do so now.**
- (g) **The Government is currently considering major issues relating to agricultural policy—both in its response to the Policy Commission on the Future of Farming and Food and in relation to the EU mid-term review of the Common Agricultural Policy. It will be releasing a sustainable agriculture strategy very shortly. This would provide a context within which our recommendations in this report can be taken forward.**

**PROCEEDINGS OF THE COMMITTEE RELATING TO THE REPORT**

WEDNESDAY 20 NOVEMBER 2002

Members present:

Mr John Horam, in the Chair

Mr Colin Challen  
Mrs Helen Clark  
Sue Doughty  
Mark Francois

Mr Simon Thomas  
Joan Walley  
David Wright

The Committee deliberated.

Draft Report [Pesticides: The Voluntary Initiative], proposed by the Chairman, brought up and read.

*Ordered*, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 48 read and agreed to.

*Resolved*, That the Report be the First Report of the Committee to the House.

*Ordered*, That the Chairman do make the Report to the House.

A Memorandum was ordered to be appended to the Minutes of Evidence.

*Ordered*, That the Appendix to the Minutes of Evidence taken before the Committee be reported to the House.—(*The Chairman.*)

The Committee further deliberated.

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[Adjourned till Wednesday 4 December at Four o'clock.]

**LIST OF WITNESSES**

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*Wednesday 23 October 2002*  
(HC 1209-i)

SIGNATORIES TO THE VOLUNTARY INITIATIVE

Dr Peter Sanguinetti, Chief Executive, Crop Protection Association;  
Mr Michael Paske, Vice-President, National Farmers Union; Mr John Kinnaird,  
Vice-President, National Farmers Union, Scotland; Mr John Best, Ulster  
Farmers Union; and Sir Henry Aubrey-Fletcher, Country Land and Business  
Association ..... Ev 4

ENVIRONMENTAL INTEREST GROUPS

Dr Alastair Burn, English Nature; Dr Paul Leinster, Director of  
Environmental Protection, Environment Agency; Dr Sue Armstrong-Brown,  
Royal Society for the Protection of Birds; and Dr Robert Breach, MBE, Water  
UK ..... Ev 23

VOLUNTARY INITIATIVE STEERING GROUP

Professor Barry Dent, Chairman, Voluntary Initiative Steering Group ..... Ev 31

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3. English Nature ..... Ev 14
4. The Royal Society for the Protection of Birds ..... Ev 19
5. Dr Robert Breach on behalf of Water UK ..... Ev 21
6. Professor Barry Dent, Chairman of the Voluntary Initiative Steering Group Ev 29, 35

## APPENDIX TO THE MINUTES OF EVIDENCE

### *Memorandum submitted by*

- Friends of the Earth ..... Ev 35



# MINUTES OF EVIDENCE

TAKEN BEFORE THE ENVIRONMENTAL AUDIT COMMITTEE

WEDNESDAY 23 OCTOBER 2002

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Members present:

Mr John Horam, in the Chair

Mr Gregory Barker  
Mrs Helen Clark  
Sue Doughty  
Ian Lucas  
Mr Jon Owen Jones

Mr Malcolm Savidge  
Mr Simon Thomas  
Joan Walley  
David Wright

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## Memorandum from the Signatories to the Voluntary Initiative

### BACKGROUND

In April 2001 the Government accepted a voluntary package of measures in place of a proposed pesticide tax. The package has a very definite structure of research, training, communication and stewardship. The entire programme rests on three pillars. These set a framework in which the programme operates and they provide elements that support progress on several of the individual projects. In addition to the pillars, there are twenty-four projects, some of which contain sub-projects. Many projects are also interdependent.

The Voluntary Initiative (VI) is being taken forward as a concerted approach to delivering effective, focussed environmental improvements by reducing the impact of crop protection chemicals. This initiative responds to society's concerns about improving the environment and is unique in the UK.

### SIGNATORIES

There are seven signatory organisations to the original agreement made with Government in April 2001. They are:

- The Crop Protection Association UK Ltd (CPA).
- The National Farmers' Union (NFU).
- The National Farmers' Union of Scotland (NFUS).
- The Country Land and Business Association (CLA).
- The United Kingdom Agricultural Supply Trade Association (UKASTA).
- The Agricultural Engineers Association (AEA).
- The National Association of Agricultural Contractors (NAAC).

Although not one of the original signatories, the Ulster Farmers' Union has subsequently joined the signatory group.

### OVERALL PROGRESS

Overall progress in the first 18 months of the Initiative has been good. However, virtually everyone involved in the Initiative, including Government, underestimated the magnitude of such a comprehensive programme. Inevitably, the development of infrastructures and mechanisms that achieve a dialogue between all stakeholders (not just signatories) and ensure that projects proceed towards agreed outcomes has taken time.

Progress on the three pillars has been significant. Before the start of the Initiative there was a lack of information relating to current crop protection practices within UK farming. The Pillar 1 survey, which was completed in March 2002, covered all aspects of the equipment being used, including the skills and practices of the person operating the sprayer. A summary of the survey was published in June, and the results are now being used to guide other parts of the VI, and assist the overall communications programme. The survey will be repeated in year 4 in order to measure progress. Pillar 2 is a project to introduce Crop Protection Management Plans (CPMPs) into UK farming. This undertaking has proved far more difficult to orchestrate than was originally envisaged. Delays have occurred as the farming unions have sought accord over:

- What precisely the ideal CPMP should cover;
- How CPMPs should interface with the raft of over twenty current and incoming regulatory and voluntary environmental farm compliance plans/audits eg as suggested by the Policy Commission on the Future of Farming and Food. To assist members of the Committee to appreciate the complexity of this point, an explanatory paper is available on request from the NFU; and

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- The means by which compliance/adoption is to be monitored and reported to Government.

Serious concerns still remain that a joined-up approach will not be achieved and that farmers will be burdened with producing a range of disparate but overlapping plans. Nevertheless, an outline CPMP has been produced, and it is anticipated that this will be incorporated into the requirements of the major Farm Assurance schemes.

Biodiversity has become a major issue for both environmentalists and the farming industry. In Pillar 3, the industry made a commitment to biodiversity by forming a network to raise awareness and assist the promotion and communication of biodiversity information within the crop protection industry. The CPA now employs a full-time biodiversity officer and a biodiversity network has been established within the crop protection industry. A biodiversity strategy and action plan is due to be published by 31 October 2002. This will guide future activities.

There are 24 other projects, which can be divided under three principal headings—research, training and communication and stewardship. 22 of the projects are now on schedule. Changes to the original timings of two projects have had to be made. Key structural changes were required to the sprayer-testing scheme to make it more acceptable to farmers but the project is now progressing well and will shortly be back on track. After further research, a project concerned with the development of farm software was felt to be too complex for most farmers and alternative approaches are under review by the Steering Group. Full details of each project are available in the First Annual Report of the VI Steering Group, which was published in July 2002 and has been provided to the Committee. Notable successes so far include:

- Holding three times the expected number of operator training events.
- Strengthening the required environmental content of adviser training.
- The launch of the new National Register of Sprayer Operators by Lord Whitty\* The production of over sixty environmental information sheets.
- The publication of the first ever Code of Practice on the Safe Use of Sulphuric Acid\* The launch of the five year £3.5m SAFFIE research project.

#### HIGH LEVEL ISSUES

The Government identified a number of over-arching issues which required specific actions.

#### *Incentivisation*

The Government asked the CPA and the signatories to consider how farmers and others could be encouraged to adopt the measures contained in the VI. A small group, from the signatory and other organisations, was set up to consider the matter and a report was sent to the Minister for the Environment (Mr Michael Meacher) in September 2002.

The issue is complicated and can only really be considered on a project-by-project basis. It is clear that the farming and crop protection industries and other signatories are fully committed to the VI. The challenge is to convince each farmer to make changes at a time of severe economic crisis within the agricultural sector. This is not easy, so two key elements were identified as being essential ie the use of effective communications to reach the target audiences, and the incorporation of CPMPs into the voluntary Farm Assurance Schemes.

Other areas where only Government can provide the incentivisation were also identified notably the modification of the set-aside scheme to allow more widespread adoption of 10m set-aside headlands, and the creation of 5m set-aside buffer strips adjacent to water.

#### *Indicators and Targets*

In order to measure a real reduction in the impact of pesticides on the environment throughout the UK, indicators relevant to the scope and activities within the VI have been identified. To avoid duplication considerable reliance has been placed on the work of the Pesticide Forum's sub-group on "Outcomes and Indicators" which had already identified useful indicators of responsible pesticide use. The VI Steering Group has also identified a number of "response" indicators which can be used to assess progress in the adoption of new measures. Targets for all indicators have been proposed to the VI Steering Group.

Base line data is available on the key water quality, wildlife and "response" indicators. This will assist in gauging overall progress. Whilst there is a direct connection between crop protection products and measures such as water quality, the relative impact of crop protection products on wildlife and habitats is more difficult to assess. Increasing the populations of birds and the creation of improved habitats take time. In addition, both are affected by general changes in agricultural policies and practices rather than the specific impacts of crop protection, therefore, careful interpretation will be required.

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### *Resources*

When the VI was agreed the CPA estimated that the total cost to its member companies would be £11.9 million spread over the five-year period. This was composed of several elements and included costs of staff time and actual financial expenditure. The cost, at the maturation of the programme, to the farming sector is estimated by the farming unions to average approximately £11 million per annum. The costs to individual farmers relates mainly to training and improvements in spraying equipment and facilities.

Delays in the start of some projects and the general structure of the VI resulted in lower than anticipated expenditure of resources in the first year. The total expenditure was approximately £2.4 million in the first year. An infrastructure is now in place to record the use of resources and it is expected that expenditure will significantly increase in future years.

Costs to other organisations and sectors are considerably less, but nevertheless significant.

### *Implementation in other parts of the UK*

Agricultural and horticultural practices and growing conditions vary significantly throughout the different localities in the United Kingdom. The signatory organisations have been keen to reflect these differences in the implementation of the Initiative and structures have been put in place to do this. Specifically, implementation groups have been formed in Northern Ireland and Scotland. Colleagues in Wales are now considering whether an implementation group is required.

### *Communications*

Communication of clear messages about the VI is vital to the overall success of the programme. Unfortunately, the time taken by the Minister to approve the name and logo for the VI caused a significant delay in the communication process. A web-site has now been developed and is being used as the main route to keep the implementation process of the VI transparent ([www.voluntaryinitiative.org.uk](http://www.voluntaryinitiative.org.uk)). Three leaflets have been produced for farmers and a total of six research reports have been published. Additionally, an advertising campaign about aspects of water protection has been run in the national farming press.

### KEY ISSUES

THERE ARE A NUMBER OF KEY ISSUES THAT THE COMMITTEE MAY WISH TO CONSIDER:

1. Despite initial delays, the Initiative is now making good progress. Now that the relevant infrastructures are in place, progress will accelerate. It is important not to under-estimate the complexities involved in the creation and execution of schemes like the operators' professional register or the sprayer testing scheme.

2. When originally conceived, the VI was seen as a partnership approach to reduce any adverse environmental impacts of crop protection products. So far there is little evidence of this from central Government. Positive support and an integrated approach is vital if such a large project is to succeed. The devolved administrations are providing strong signals that they are prepared to help to make the Initiative succeed.

There are clear overlaps between the VI and elements contained within the report from the Policy Commission on the Future of Farming and Food. Given that the Treasury is keen to "pilot" some of the Commission's recommendations, it seems logical to use the VI by giving it the appropriate level of support.

3. The Initiative was agreed for an initial period of five years. This is a relatively short period in which to bring about environmental change. The Government must be realistic in its expectations of what can be achieved. Equally, the Government must appreciate that this is a groundbreaking agreement and will provide unique and valuable information about how other such schemes may be approached in future.

4. In each of the recent budget and pre-budget statements the Treasury has continued to hang the threat of a pesticide tax over the farming industry. This is not helpful and is likely to act as a disincentive to many farmers who will have to make significant investments in a time of farming crisis. In our view it would enhance the prospects of success if the Government indicated that it had confidence in the VI and would not be rushing to judgment on a biannual basis.

5. A number of indicators to measure the success of the Initiative have been suggested. With these it is essential that a separation is made between the specific impacts of crop protection and the more general impacts caused by changes in farming practices over the past three decades. The signatory organisations and the environmental groups all agree that declines in certain farmland bird species cannot be solely attributed to crop protection, and expectations for the recovery of these populations must be realistic.

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[Continued

### Examination of Witnesses

Signatories to the Voluntary Initiative: DR PETER SANGUINETTI, Chief Executive, Crop Protection Association, MR MICHAEL PASKE, Vice-President, NFU, MR JOHN KINNAIRD, Vice-President, NFU Scotland, MR JOHN BEST, Ulster Farmers Union, SIR HENRY AUBREY-FLETCHER, Country Land & Business Association, examined.

#### Chairman

1. Welcome to the Committee and thank you first of all for sending us the written memorandum, which we greatly appreciate. Secondly, thank you for sparing the time to come and see us today. Thirdly, thank you for all coming together because it does actually speed things up. It saves your time, I hope, and it certainly saves our time if we can have all of you together in a bunch rather than one by one. I am sure you appreciate that but thank you none the less. Is there anything you would like to say by way of any very brief introductory statement?

(*Dr Sanguinetti*) Thank you very much, Chairman. I am Peter Sanguinetti from the Crop Protection Association. My colleagues are John Kinnaird from NFU Scotland, Michael Paske from the NFU, Henry Aubrey-Fletcher from the CLA and John Best from the Ulster Farmers Union. If I may say just a few very quick words to put it into context. I am relatively new, as I think you appreciate, in this job but it is impossible not to be impressed by the comprehensiveness, size and magnitude and the degree of cooperation of all interested parties in this big project, which has as its objective making the environment a priority and getting results right down at the grass roots. We have done a lot of valuable spade work. A lot of targets and preparations have now been made and we are ready to move forward to put this into action and that is the next step. It is very important at this particular time with agriculture in a very difficult financial state—you have seen the Deloitte report in the newspapers, no doubt, today—that we must motivate farmers. We do actually want their cooperation and they do need a lot of encouragement. It would be nice to have some kind of fiscal support. We see in the longer term this coming over the horizon from the development of the reaction to the Curry Report and further from Europe, where Commissioner Fischler's review of the CAP has as one of its priorities shifting money from stimulating production towards rewarding farmers for environmental initiatives and we think that is very important. That sort of money is very, very important. I know, I have a small farm in Somerset on the levels and it is under an ESA. It has just done ten years under a tier 1, tier 2 programme and the RSPB are now very pleased that after about eight to ten years it is really showing results and the birds are coming back. I know that from experience. So incentives can work in that way.

2. Thank you very much indeed for that. We, too, think it is an important issue, which is why we have come back to it after looking at this three years ago to see what is happening because we do believe that one way of making things happen in government is to monitor things closely and come back to them and not to let them get lost, as sometimes happens with Select Committee Reports. We do believe in carefully monitoring things like that. So thank you for saying that. We share your sense of the importance of this.

(*Dr Sanguinetti*) Obviously if you can encourage the Government to do those sort of things—

3. Yes, indeed. We always encourage the Government.

(*Dr Sanguinetti*)—and to speak to the French, who are trying to make it difficult for Fischler.

Chairman: Thank you very much indeed for saying that. We want to look at the sort of progress that is being made and I know Mr Thomas wants to come in on that.

#### Mr Thomas

4. Yes. Thank you, Chairman. Good afternoon, gentlemen. I want to start first of all by asking simply who is responsible for monitoring progress on the Voluntary Initiative? Is it yourselves as the signatories to the Initiative, is it the wider Steering Group or is it Professor Dent, as the independent chair himself? Who simply is responsible for the monitoring?

(*Dr Sanguinetti*) Both are involved obviously. We at the CPA run the secretariat and the organisation of it, so we do the actual physical work in putting it all together. At the more strategic level Professor Dent, who I believe is here later on this afternoon and can explain it further, is much more at the big decision level. We are the implementors, the monitors and the collectors of information in very succinct terms.

5. You are speaking on behalf of the CPA there?  
(*Dr Sanguinetti*) Yes.

6. What about the signatories? What is the role of the signatories in monitoring?

(*Mr Paske*) We are all part of the Steering Group, if I could answer that, Chairman, and obviously we take a very active role in that by being members of the Steering Group and obviously we work very closely with Professor Dent, who is then responsible obviously for reporting to ministers on a regular basis. So it is something where we meet on a very regular basis to monitor the progress that is going on with all of the projects and then obviously Professor Dent is then responsible for responding to and reporting to ministers.

7. So you would receive quarterly monitoring reports, perhaps, six weekly reports, we understand?

(*Mr Paske*) At least that. We have at least four meetings a year but we get regular reports on all of the different projects. We are actually in operation on a very regular basis, in fact I would say on a constant basis.

8. What do you monitor against? What is your baseline?

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[Mr Thomas Cont]

(Mr Paske) Well, we have indicators, which we have agreed with Government we will be measured against (if I can put it that way) and those are the measures which we are using obviously to note our progress.

9. You undertook, I understand, a farm survey in order to do some of the baseline work to monitor against that?

(Mr Paske) Very much so.

10. Did that survey suggest to you, as members of the Voluntary Initiative, that there was scope for reducing the use of pesticides?

(Mr Kinnaird) I think I could answer that one, Mr Chairman. I think what the report highlighted was that even with best practice we can all improve and that is the benchmark of this report and the survey will continue and will be done, I think in year four. That will be the benchmark and that will be a very clear indicator on some of the results and the very positive benefits that come out of the Voluntary Initiative. I think we have to remember that we have quality assurance and quality assurance for the vast majority of people will be the livestock producers or cereal producers or arable producers. They are signed up to quality assurance schemes and they dictate quite a lot of what can and cannot be done as far as pesticide usage is concerned. Anything that the Voluntary Initiative will come up with is best practice and how practice can be improved and although a reduction in the usage of pesticides is not the ultimate aim that may well be a benefit of better use of pesticides in the longer term.

11. You completed the survey in March 2002, I understand. That would have given you an idea from some 700 farms of pesticide use at the moment, not just the level but the best practice, the spraying, the use of equipment, and so forth. Are you saying you would expect in future years to see a reduction in pesticide use or are you saying that you would expect to see just improvements in the quality?

(Mr Kinnaird) What we would expect to see is a better use of the chemicals, both from a water quality point of view and an environmental point of view, and if at the end of the day that is coupled with a reduction in pesticide usage then that is all to the good but that is not the aim of the Voluntary Initiative. The Voluntary Initiative is to look after the environment and that is what we signed up to and that is what Government agreed with us at the very outset and that is what is important. If there is a reduction in pesticide usage at the end of the day that is an added benefit but I do not think that should be the goal; the goal has to be best practice and best practice for water quality and for the environment.

(Mr Paske) I would like to support that entirely.

12. That is why your first annual report does not mention actual pesticide use in terms of litres or thousands of litres, or whatever; it is concentrating on practice?

(Mr Kinnaird) Yes.

**Chairman**

13. You never quantified the potential for a reduction in pesticides?

(Mr Kinnaird) There is a huge potential, I believe, for a possible reduction in pesticides.

14. But you have not quantified it?

(Mr Kinnaird) No, it is impossible to quantify at this stage. It is actually very difficult when you are talking about a voluntary initiative but I think what we will see at the end of the day when the next survey is done is that will be—if you like, we have the benchmark now and the rest is up to the Voluntary Initiative to deliver it.

(Sir Henry Aubrey-Fletcher) I think all of us here farm and I use agri-chemicals and they are expensive and you do not want to use more than you need so you use the optimum amount of chemical in order to do the job. If you reduce it below the optimum amount it affects the yield of the crop and the quality of the crop and at the end of the day the performance of the business so you have to get that balance right. There are new chemicals coming along all the time which are more benign and do the job better so you will see anyway a gradual reduction on the impact. I think the key word is the “impact” of the chemical rather than the specific volume that you use.

Chairman: Mr Jones.

**Mr Jones**

15. Some people would be surprised that it is not an objective to reduce the amount of pesticides but you clearly have an argument in that it is not the amount of pesticides, it is the effect. Why do you not have within the pillars of this Voluntary Initiative any clear requirement to measure effect? All you have are processes. If you say—and you have an argument—that the total amount of pesticides is not the issue but the effect, should you not really be measuring the effect?

(Sir Henry Aubrey-Fletcher) The agreement with the Government is to minimise the environmental impacts of crop protection chemicals. It is the impact that we are working on. All the tests and the targets are aimed at the impact the chemical has. You could take an example. For example, you could use less chemical by spraying a whole field with a water course—

16. Sorry, those are processes. Can you explain any one of the indicators which measures effect?

(Sir Henry Aubrey-Fletcher) Well, water, for example; a lower level of a particular pesticide in water in five years’ time compared to now, for example, as long as we have got baseline data. It is in those areas, we have suggested, and we are working on indicators, that we can show there is X amount of whatever it is in the water now and there is Y in five years’ time and if there is a reduction then we have been successful.

17. When will you be publishing any data on that?

(Dr Sanguinetti) Can I actually come in there, because we have just published a paper which is available. It is a lengthy one and it has come out this week, called For the Benefit of Biodiversity, and this is the first very, very comprehensive report from our

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biodiversity officer. It is a strategy and action plan for a better environment and listed in there are all the Government indicators and many of them that we will actually work hard to support such as, for example, a 30 per cent reduction in pesticides in water. You know that the limit for drinking water is one in ten billion and above that level they have to remove it from the water and there is a 30 per cent reduction target which we support for 2005. So that is a very big indicator, if you like. There are other indicators, for example grey partridges and corn buntings, and they are quite long term. Obviously we will do our best with the particular targets. For example, doubling the number of grey English partridges by the year 2010 is a target which we would like to support. It is not what we do that has the only impact, there are lots of other things, for example the weather and all sorts of other things as well. But that is a long range target which we are working towards, for example. We have got this very big report for you, which we can send to the Committee to peruse. It is quite comprehensive and it has just come out.

18. Will your biodiversity officer be responsible for doing any measurement of data himself?

(*Dr Sanguinetti*) Yes. It is a lady actually. Yes, it is very important. She is full time and she is working in our offices, and yes; this is just the start of the process.

19. Thank you. Just one other question. The involvement amongst your signatories of people who are involved in the industry of producing pesticides, surely it is against the commercial interests of those companies to wish to see pesticides either used more effectively or used less?

(*Dr Sanguinetti*) We are committed to the effectiveness. For example, in the practical terms we were talking about a minute ago, if you apply the agri-chemicals accurately—that means making sure that the equipment is good and, for example, that nozzles are not worn out, which wastes material, spillages, doing it at the wrong time when the wind is blowing and it is spraying in the wrong place, there are all sorts of things you can do—then yes, there would be less use. But it is very important too that the industry, because there is great technological advance, continues to work at producing newer and more eco-friendly products. I think you all know that in the middle of next year out of the 800 agri-chemical categories that are available 500 are going to be stopped by the EU. At the end of next year they will be out of use altogether. So we are aware of that and it is important, obviously, from our point of view. You need agri-chemicals in order to make sure you get the yield of the product in order to feed the population and also to have healthy food so that you have not got infestation of pests or fungi, or whatever. So there is a balance here where the job needs to be done and it needs to be done increasingly in an eco-friendly way and that is where we are.

(*Mr Paske*) Mr Chairman, may I just add to that that from the practitioners' point of view we are very, very keen to save money and if the more effective use of chemicals means that we reduce money being spent on our outgoings then obviously we are very, very keen to make sure that that is followed.

20. Yes, I understand that you would have a commercial interest in reducing the amount of money you spent on pesticides.

(*Mr Paske*) Indeed so.

21. I just question whether the pesticide manufacturer has a commercial interest?

(*Mr Paske*) Well, that is why the stakeholder body is so important. Right at the beginning, when we were in discussions with Government agreeing the terms for this Voluntary Initiative, the chemical manufacturers came to us because they realised how important we were in the whole of the equation. So we are delighted to be stakeholders and I know I speak on behalf of the other farmers' unions in that regard.

Mr Jones: Thank you.

**Mr Thomas**

22. I think this is probably a question for the two representatives from the NFU here. The second pillar of the voluntary agreement is on Crop Protection Management Plans, which we understand have been slow in coming forward. Can you now tell us whether you have agreed the basis for those plans and how they relate to pesticide use in particular?

(*Mr Paske*) Can I start off by saying yes, we have now agreed the basis for those Crop Protection Management Plans but, Mr Thomas, one of the major reasons why we were slower than we anticipated coming forward with these crop protection plans is something which I hope you and your Committee can do something about and that is the plethora of different regulations which are now coming through on the farming industry. Not only do they conflict but they overlap. A classic, if I can give you the example, obviously you will be well aware of the report which Sir Don Curry concluded last year where he talked about introducing a broad and shallow environmental scheme. One of the things we are concerned about—the Voluntary Initiative is ahead of the pack on this but what we want to make sure is that we are not introducing yet another layer of regulation (if I can put it that way) which is going to be conflicting with something which might come out as a result of the Curry Commission. Then, as has already been mentioned this afternoon, the mid-term review again talks about having farm audits and all sorts of other environmental and cross compliance. Again, you see, there is this conflict there that we need to have joined up government (if I can put it that way) because it is so difficult for us to be able to push ahead on this one initiative and yet still be giving an eye to what is going on in these other initiatives as well. That is one of the major reasons why we did not move forward as fast as we might have done. John, I do not know if you want to add anything?

(*Mr Kinnaird*) I would wholeheartedly concur with all that Michael has said and it is very, very difficult if we are trying to get a voluntary package together. We are actually asking practitioners, the farmers, to actually do more and more paperwork and there is a grave risk that you actually have duplication. An awful lot of what is in the Crop Protection Management Plans is already covered, for example, under the Scottish Quality Assurance, cereals—

(*Mr Paske*) And our assurance schemes as well.

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(Mr Kinnaird)—and the farmers' assurance scheme. The danger there is that you are asking people to duplicate what is already done. I think what is more important than anything is to get people aware of and signed up to the need to do Crop Protection Management Plans and that is the stage we are coming to. Michael has already alluded to the Curry Report and that is very important but in Scotland we have a thing called the Forward Strategy, which again is signed up to environmental issues, and under the Agricultural Environmental Working Group it has already reported as part of the Forward Strategy. So this is an ongoing process.

23. You said, I think, that you wanted to get about 30 percent signed up to these Crop Protection Management Plans. What are they doing in terms of addressing actual pesticides or the use of pesticides? Are we back at the best practice level or are they addressing actual levels of use as well?

(Mr Paske) Again they are talking about more effective use and of course they will be linked in to be monitored by the various assurance schemes both in Scotland—obviously I speak on behalf of England and Wales and John Best, my colleague in Ulster will be able to give you his position—but they do link in with those because one of the things that we came to an agreement with the NGOs on the Steering Group was that we could, through using the assurance schemes, deliver far many more farmers into this Voluntary Initiative than we could if we were trying to set the start level or the entry level (if I can put it that way) too high, because the NGOs at one stage were wanting to go to what I would have classified as a thesis level. But obviously we have now, with their agreement, set it at a sensible level and we can delivery quantity of members on that basis rather than a small number of practitioners.

24. Both of you have mentioned the present agri environmental schemes that are already in existence in either Wales or England and also the possible ones but we are working with what we have got now at the moment.

(Mr Paske) Yes.

25. Have you worked out any type of reciprocal arrangements with those schemes where a farmer going into that—in Wales it would be the Tir Glas scheme (the old Tir Cymen agrienvironmental scheme)—by going into that and by agreeing to that scheme he or she would in themselves then also be agreeing your Voluntary Initiative? Have you been able to do any reciprocal arrangements along those lines in order to cut down on the sort of bureaucracy that does face farmers?

(Mr Paske) That is one of the key things that we are discussing under the mid-term review, for example, because Frans Fischler was very impressed with the way that assurance schemes work in the United Kingdom and obviously one of the things he was looking at was that perhaps that might be something which could be brought into consideration under the mid-term review for cross compliance, for example.

(Mr Kinnaird) To come back to Crop Protection Management Plans, I think this is not just also about best practice, it is also to do with making people (i.e. the practitioners) more aware of the environment

and the possible impact of the pesticides. I think that is something which has been quite clearly missing from a lot of the training initiatives which have been going on in the past. By doing a Crop Protection Management Plan part of that is answering questions on training and skills. Now that is very important because you are taking that away from just the decision-maker to the actual person who is applying the chemicals, applying the pesticides to the crops. So I think it is very important that it has a very broad remit and that is one of the most important points about a Crop Protection Management Plan. It is not just about best practice, it is about involving everyone in the use of pesticides.

**Mr Barker**

26. I would just like to return to this very important point you made about over-regulation and duplication. In sort of political jargon that is almost becoming a cliché now, one hears it so often in so many areas. What would be very useful, I think, for this Committee if we were actually to do something about that or to try and make some sort of impact—I was just looking through your very extensive submission—is to actually have some detail. It might sound ironic to ask for further details from you on that but really one can only make progress if one is actually given the very specific regulations and duplications that you talk of, because if one talks in generalisations we will all nod and agree with you but the result is that it will not actually lead to anything. But if you could bear to actually let us have some real specifics that we could take up with the Minister that would be very useful.

(Mr Paske) Mr Barker, thank you for bringing that up. There has been somewhat of a discussion amongst us all on this one because we have produced a matrix and in fact we were going to attach it to your papers but we thought we had overwhelmed you with papers already. But we do have it in a very simple form and we will be delighted to make that available to the Committee.

27. The expression is, “Here is one I prepared earlier.”

(Mr Paske) Indeed so, yes.

**Mrs Clark**

28. I would like to take us back to the issue of delay again. You have given some reasons, including over-regulation, but I understand that there are others. Do you actually consider that the delay in giving the programme even a name and an identity caused any significant problems, because it is my understanding that it took the Minister more than six months to make up his mind to call it the Voluntary Initiative?

(Sir Henry Aubrey-Fletcher) That was a difficulty because in order to get the message out to our members and to farmers we have to have a vehicle with which to do it and with things like web sites, leaflets, even dealing with the media, we had to have an identity and we did have difficulty finding a name which would be acceptable to the Minister. We got there in the end and as soon as we got the name we were up and running with that.

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[Mrs Clark Cont]

29. Well, at least six months and not a year. But according to Professor Dent's comments in his September 2002 report he actually said that seven of the projects, that is over a quarter, are behind schedule. What is the reason for that?

(Dr Sanguinetti) We have caught up on that, I think.

30. You have caught up?

(Dr Sanguinetti) There are only two behind at the moment; one is computer software and the other one is testing spray equipment, as I understand it. The others are up to speed—

31. So there has been progress made there.

(Dr Sanguinetti)—of the twenty-seven projects.

32. On a sort of wider issue in terms of delay, what about the Government's own expectations? Do you think their expectations of what can be achieved are realistic, because it is not always apparent, I do not think, that the Government appreciates the difficulties in bringing about environmental change? There is often a premise, we take it as read that the imposition of a pesticide tax would bring about an immediate change which would be of benefit to the environment.

(Sir Henry Aubrey-Fletcher) What we have got to achieve has got to be achievable. That is sort of double speak but the targets and indicators have got to be realistic and they have got to be linked to reduction in the impact of pesticides. A lot of the things the Government wants to do—and we signed up to with them—require other things to happen. We have heard about the corn buntings and the grey partridge is a very good example and there are many other factors. So we have to have an understanding between us all that what we do must be realistically achievable. We are pretty confident now with the second draft of the indicators that those can be done but we are a partnership. We are a partnership of the farmers, the crop protection industry, the environmental groups and the Government and the Government must play their role as a key partner in all of this and we really want them. They were working with us on the Steering Group.

33. Are they doing so?

(Sir Henry Aubrey-Fletcher) I hope so.

34. You hope so?

(Sir Henry Aubrey-Fletcher) At the moment the Sword of Damocles is still rattling about. It would be very helpful if the Sword of Damocles was put down and they supported us for the next four years to help deliver these things and they can lift the Sword of Damocles up again afterwards if we have not made progress. But we really want them to play the role of full partners from now on, if they would.

(Dr Sanguinetti) There is the constant threat of a pesticide tax. The pesticide tax in the first place has galvanised the whole industry into action so you could call that a positive reaction, but if you bang on about it too much the farmers will get sceptical, to put it bluntly. I live in a farming community and they think, "Well, if we're going to get the tax any minute anyway why should we try it?" So giving the five year opportunity—of course it is there as a stick to beat us with at the right time but to go on too much is counter-productive at this stage because at the next

step, and I think it is terribly important to make this point, we actually are going to depend upon the farmers themselves on their farms cooperating with this and delivering the results and we have got to not just convince them it is a good idea, we have got to motivate them and we must not de-motivate them. That is quite an important thing. To make it work we must give them encouragement.

35. Actually I wanted to take us on to farmers so that has been helpful. How important to the success of the Voluntary Initiative do you think is 100 per cent take up by all farmers?

(Mr Paske) Well, it is a wonderful goal and whether it is achievable or not obviously only time will tell, but I am certainly confident that the larger scale professional farmers will fall into line; indeed they are doing so already and they are already signing up to a number of the initiatives that there are within the Voluntary Initiative. The area where we are going to have the greatest difficulty, however, is with the smaller user who only uses very occasionally because for them the incentive of actually joining the Voluntary Initiative as opposed to paying a very small amount of tax—it is a very difficult incentive to actually make them understand why it is necessary to sign up to the Voluntary Initiative. But we are confident that we can deliver the measures that we have agreed with Government.

36. I think most people would think that it is going to be costing farmers time and money without any obvious rewards. Do you think that only the sort of carrot and stick that the Voluntary Initiative can provide is the avoidance of a tax? Is that the only thing?

(Mr Paske) That is not the only thing, certainly not, because we are finding that a lot of people are signing up to the assurance schemes because their customers are obviously wanting to buy food which is assured. Obviously the Voluntary Initiative, as you have already made clear, links in very closely with those assurance schemes. We would love to see a situation where the general public paid us a premium for those assured foods but unfortunately what we tend to find in the market place is that if you are not signed up to an assurance scheme then you will not sell your product rather than a situation where you are paid more for actually producing an assured product.

37. Let us look at it from the other perspective. If Government were to give a firm commitment not to introduce a pesticide tax, what effect do you think this would have on farmer motivation?

(Mr Paske) How about the Scottish perspective there?

(Mr Kinnaird) I think it would be very positive. I think that is what you call passing the buck, Mr Chairman. As short a time ago as last week we had a meeting in the water catchment area in the north-east of Scotland and to a person sitting around the room that day there was a complete and utter commitment to making the Voluntary Initiative work. It was quite surprising, very overwhelming; actually, if I was being perfectly honest, I would say I was surprised. But the one thing that still bothers people is the fact that the tax is a disincentive.

(Mr Paske) Yes.

[Mrs Clark Cont]

(Mr Kinnaird) I think what is important is that the Voluntary Initiative is given its five years to prove it can deliver what it is meant to deliver. If we did not think the indicators were achievable we would not have signed up to them but I think it is very, very important that the Initiative is given the opportunity to deliver what it believes it can deliver and perhaps deliver more. All those who signed up last Thursday are already in environmental schemes in that catchment area and they are quite prepared to do more to make this work but they are very concerned that they do more and incur a degree of cost there will still be the risk of the imposition of a tax before the end of the five year period, before any real results, measurable results can be seen and it does take time for these measurable results to become apparent.

38. But some people have actually said that a tax would be less expensive for farmers?

(Mr Paske) For some, yes.

(Mr Kinnaird) For some farmers, yes, that could well be the case.

(Mr Paske) Absolutely.

(Mr Kinnaird) I would not dispute that but that is always the case. I think we have got to look at what would a tax do. Would a tax actually deliver environmental benefits? Quite frankly, I doubt that; so does Scottish Water and so does the Scottish Environmental Protection Agency. They are signed up to this Voluntary Initiative and they wish to see it put through its paces and see that it can deliver what we believe it will deliver at the end of the day. They are wholeheartedly of the one opinion that a tax is a very blunt instrument and will not deliver what Government ultimately looks for and that is improvement in water quality and biodiversity.

Mrs Clark: Thank you.

#### Ian Lucas

39. You have agreed, I think, 17 indicators and targets grouped into five stages. Where do quality assurance schemes fit in with the process of formulating these indicators? Did you take those into account in trying to establish them?

(Mr Kinnaird) Yes, we did, because they are a very important means of—not policing, I think we have got to be very careful not to use that word, but they can monitor what actually is happening on the ground. At this time I will only speak about the Scottish quality scheme and we are assessed independently every year. So there is an ongoing monitoring system of what is actually taking place on the farm and a lot of it is record keeping, keeping things that we are meant to do and actually documenting it. That is why an awful lot of it already falls into some of these—

40. That is in respect of the quality assurance scheme?

(Mr Kinnaird) That is in respect of quality assurance.

(Mr Paske) But it is much the same for the assurance schemes in England and Wales as well.

41. The current indicators are consistent with those schemes, is that right?

(Mr Kinnaird) Some go beyond it and that is where we have our Scottish implementation group, which will be meeting fairly soon. For example, SFQC look after all the quality assurance schemes in Scotland and will be sitting on that implementation group, so they are a part of it. As an implementation group we could not possibly go to SFQC and say, “This is what you must do.” They have to be part of it. It is all about partnership.

(Mr Paske) I am sorry to interrupt but it is not quite the same in England and Wales because we have different types of assurance schemes for different types of commodities. Some of them are at least up to and above the Scottish level but some, unfortunately, at this stage are behind but they are doing something about that; they are addressing the issue. Of course one of the things we are trying to do as the National Farmers Union is to bring those schemes up to a sort of common standard (if I can put it that way).

(Mr Best) Northern Ireland has a similar system to Scotland. We also have an implementation group with all the bodies on it who have the say and it has made a lot of progress since the outset.

42. How did you collect together the baseline information from which to start on all of this from all the different sources? We have got a lot of organisations which are represented here.

(Dr Sanguinetti) That was the first step in the whole process, doing the survey, and that is what we published, I think it was in June this year. That had not been done before, it was unique, and that was an important fact-gathering initiative. That was the first step.

43. Are you satisfied that the indicators you have now got are going to be good enough for you to satisfactorily measure progress?

(Dr Sanguinetti) Yes.

(Mr Paske) Yes, absolutely.

(Mr Kinnaird) I think the other important thing is there is a thing called the Water Framework Directive, Mr Chairman, which will be around, I think it is from 2004, and will have a serious impact on how Government addresses the Water Framework Directive. I believe that this Voluntary Initiative goes a long way towards highlighting that UK agriculture is in place and is willing to do something to try and meet Government targets.

#### David Wright

44. I would like to turn, if I could, to some questions about resources and costs collectively from you all. The VI was due to cost the industry, I understand, something in the region of £11.9 million over five years and Professor Dent’s report to ministers suggests that £2.3 million has been spent in the first year. I am interested in issues around scale. What does this represent in relation to the overall turnover of the agri-chemicals industry in the UK?

(Dr Sanguinetti) The total turnover of the agri-chemical industry was just under £500 million last year.

45. So not a lot really, is it?

(Dr Sanguinetti) That is turnover, not profit.

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[Continued

[David Wright Cont]

46. But it is small beer, is it not, when you look at the overall figures for the agri-chemical industry? Looking at the £2.3 million, what percentage of that is real and what percentage results from apportioning staff time?

(Dr Sanguinetti) Sorry, can you—

47. How much of that £2.3 million expenditure would be related to staff time, labour input?

(Dr Sanguinetti) A very significant amount. For example, the CPA, we worked out something like 44 or 45 per cent of our time over the last year has been dedicated to this, which is a cost. It is people; you have to pay them. So people are an important resource in this area. We were actually able to split up that figure; round about half that £2.3 million comes from farmers and farmers' unions at this stage. I can give you a bigger split if you like. But that is only part of it because we are now moving into the next stage where we are moving towards a much bigger expenditure from the farming community, which is estimated to go up to £11 million per annum. So we are moving now. When we have done our homework these costs will go up. We have done our homework, done our preparation, done our plans; the next step is to make it work and that is when the costs go up.

48. Go on, convince me.

(Mr Paske) Let me give you a personal example. I have budgeted the costs of the Voluntary Initiative in my own small horticultural business as being about £1,200 next year. The reason for that is because that is made up largely of training, of complying with the various things which are laid down under the Voluntary Initiative. As I say, that is quite a small operation. It will vary according to the size of the organisation but £1,200 on my turnover is a lot of money.

49. Do you think if the Voluntary Initiative had not been in place we would have seen a significant amount of resources devoted to this area of work anyway?

(Sir Henry Aubrey-Fletcher) I think the threat of the tax has got us all here and I think we all accept that. It has raised the whole thing up the agenda so it has been successful, it has done its job. It will now be negative if we go on about the threat of the tax on a continuing basis all the way through the next five years because what it will do is send out a message to farmers, "Whatever you do, whatever the Voluntary Initiative is trying to achieve, the tax is going to come anyway so what is the point of doing all of this?" That is the one thing we want to avoid. We want the message going out to farmers saying, "This is something positive. This is going to improve the way you farm. It is going to be good for the environment", all the things that actually farmers want to do but they do not know how to do it necessarily. Everything that is coming out of this that I have seen so far is terrific in terms of better practice and better use of materials.

(Dr Sanguinetti) Making the effort is terribly important because the Deloitte Touche study which was in several newspapers today is very, very illuminating. The farming economic situation is very bad and they are losing £8 an acre on farming according to that study. So putting the effort in is terribly important.

50. Have any of these signatory organisations recruited any extra staff apart from the biodiversity officer to provide extra resources for the Voluntary Initiative?<sup>1</sup>

(Mr Paske) Well, we have not recruited additional staff but we have had to recruit a heck of a lot of additional members to support what we are doing. The classic one that John was mentioning to you earlier, the catchment area management schemes, in terms of farmers' involvement in those we have had to find very significant numbers of farmers who are prepared to get involved in that and not only get involved in it from just partaking in it but particularly also for helping to administrate those particular schemes. I do not know what yours was in Scotland, John, but I know that in one of the ones in England it was necessary to find an extra 50 farmers in one particular catchment to be able to do that work and ask one of those farmers to coordinate the effort of all of those 50. So it is a lot of extra additional work for them.

51. How much understanding has there been at grass roots level? Has there been an upward pressure from farmers on this?

(Mr Paske) No, absolutely not.

(Mr Kinnaird) I think we have got to be perfectly honest and say no, not at this stage but part of that is—

(Sir Henry Aubrey-Fletcher) We had to get back to the name. We could not start talking to the farmers until we had the name and that delayed the process. Once we got the name we could start to talk to them about the Voluntary Initiative.

(Mr Kinnaird) But I think what is very important is that the CPA has set up a web site, the Voluntary Initiative web site, which has clear links from all our separate organisations and that is one of the quickest ways of getting the message over. We currently do a monthly newsletter and every newsletter since the Voluntary Initiative was established we have always put something in, so we are raising the awareness.

52. I think this is about culture change.

(Mr Paske) Very much so.

53. That is unfortunately what it is about.

(Dr Sanguinetti) Gentlemen, I have actually an example. I will leave it with the Committee. This is a new one which is coming out on Friday. We have 10,000 of those and that costs quite an amount of money. Insecticides—the best practice to minimise their environmental impact on arable crops. So that is coming up. I will leave this for the Committee, and a great wad of propaganda material, if you like, advertising material, persuasive material. I will leave that for you to peruse, which gives you some idea what is happening with the money.

Chairman: Thank you. Mr Thomas.

**Mr Thomas**

54. Thank you, Mr Chairman. I just want to ask you one question. Before I do I just want to make a statement, which is just that I have heard about the implementation groups in Ulster, Northern Ireland and Scotland so I hope there will be one on the way

<sup>1</sup> See supplementary memorandum from Dr Sanguinetti.

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MR JOHN BEST AND SIR HENRY AUBREY-FLETCHER

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[Continued

[Mr Thomas Cont]

for Wales, obviously. The question I wanted to ask you is what consideration the Voluntary Initiative is paying to GM crops. If you are heading for four, five years, the next four years really, the very possible reality of the commercial growing of GM crops in this country in that period, what discussions are you having within the Initiative and amongst the stakeholders about the impact of GM crops on the aim, which is of course to minimise the environmental impact of pesticides, which some people would argue GM crops do?

(Dr Sanguinetti) I am actually meeting for the first time my opposite number in an organisation called ABC, who do the same sort of job as we do for GM. We are running parallel with that so I will be in a better position to tell you more when I have had those discussions tomorrow.

55. So you have not had those discussions as the Initiative yet?

(Dr Sanguinetti) Well, I have to warn you I have only been in this job for three weeks. If you give me a little time I will get connected.

56. But there are others as well. I do not know if there are other views on it.

(Mr Kinnaird) We have not discussed this as a separate issue. There are things that we will have to take into consideration obviously in the overall picture, but I think we are quite a bit away from the position GM crops are going to have in UK agriculture. I think we will have to take it into consideration but not look at it in isolation.

57. So it would be fair to say that whatever you achieve in your next four years you are not relying on GM crops to achieve that?

(Mr Kinnaird) No.

(Mr Paske) Oh, no.

(Mr Kinnaird) Not at all. It is current practice we are looking at.

(Mr Paske) Absolutely.

Chairman: Thank you very much indeed, gentlemen. Once again, may I say how grateful we are to you for sparing the time because you are busy men in an important industry and it is a crucial time and we hope we will come up with something which actually means a lot of sense for you. Thank you very much indeed.

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**Supplementary memorandum from Dr Peter Sanguinetti, Chief Executive of the Crop Protection Association**

Regarding staff it is correct that Ms June Edney, Biodiversity Officer, is the only new recruit to CPA specifically for the Voluntary Initiative.

We also jointly fund with Water UK a project manager to support work in the pilot catchment areas.

October 2002

**Supplementary memorandum from Mr Michael Paske, Vice-President, NFU****SCHEMES THAT INVOLVE FARMERS AND GROWERS IN ENVIRONMENTAL MANAGEMENT PLANNING**

<i>Timing/ Obligation</i>	<i>Statutory (possibly dependant on locality)</i>	<i>Commercially obligatory (dependant on sector)</i>	<i>Voluntary</i>
Current	1. DEFRA's ESA/SSSIs & Whole Farm Conservation Plans 2. Soil Erosion Risk Plans 3. Farm Waste Management Plans 4. The Groundwater Regs* 5. Nutrient Management plans (NVZs) 6. FEPA & LERAPs** 7. Environmental Impact Assessments for EU F&V Regime, etc. 8. IPPC & the Packaging Waste Regs. 9. Climate change Regs.	1. Assured Produce Scheme* 2. BOPP* (ornamentals) 3. MPS* (flowers) 4. Specific UK multiple retailer specifications* 5. EUREP* (Fruit & Veg) 6. FWAG Landwise plans 7. LEAF* 8. ACCS* 9. HACCP (food processing industry requirement)	1. LEAF* (Linking Env. & Farming) 2. Assured Produce Scheme*(Fruit & Veg) 3. ACCS* ( Arable ) 4. Genesis* (farm assurance) 5. ISO 14000/BS5700 6. FABBL (livestock farm assurance) 7. EU Fruit & Veg Regime*** 8. DEFRA 'Countryside Stewardship'
Imminent (within 2 years)	1. EA's 'Environmental Management Strategy for Farms' 2. Water Framework Directive (CAMS) 3. The Incineration Directive	1. EUREP* (European Retailers) for arable	1. VI's CPMPs** 2. CAP Mid Term Review's Farm Audits**** 3. RPA's Farm Sustainability Ass.* 4. DEFRA's Entry Level Scheme* (i.e Curry's B&S proposal) (pilot)
"On its way" (2-5 years)	1. EU's Thematic Strategy for Sustainable Use of Pesticides** 2. Assessments under the Conservation Regs. 3. Assessments under the Environmental Liability Regs.	1. EUREP* for livestock	1. DEFRA's Entry Level Scheme* (nationwide)

\* indicates 'pesticide' content.

\*\* indicates very significant 'pesticide' content.

\*\*\* although entry is voluntary, once accepted environmental planning is statutory on participants.

\*\*\*\* currently only a proposal.

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### Memorandum from the Environment Agency

#### SUMMARY

The Environment Agency is a member of the Steering Group overseeing implementation of the Voluntary Initiative and is playing an active role in a number of the projects. The Voluntary Initiative provides an important opportunity for the agriculture industry to demonstrate that it can control and manage its environmental impacts. The Agency has the following comments on the progress and likely success of the Initiative.

- If the Voluntary Initiative delivers the promised improvements in farmer practice, it will provide environmental benefits. However, this relies on the degree to which farmers adopt the measures. We believe that unless there is a commitment by the user community to specific objectives and targets it is unlikely that the Initiative will be successful.
- Overall progress of the planned elements of the Initiative is on schedule. However, there have been delays to some individual projects, most notably the development of Crop Protection Management Plans.
- The “Incentivisation” sub-group tasked with identifying how good levels of adoption of the measures will be achieved has made slow, uninspiring progress and has yet to finalise its report. The Agency has serious concerns that without a clear implementation strategy levels of uptake are likely to be low with limited or no resultant environmental benefits.
- Indicators of success of the Initiative have yet to be put in place. Without these it will not be possible to determine the extent to which the Voluntary Initiative has provided improvements in the environment. The Agency has been assisting in developing suitable indicators and has suggested a framework for reporting these. We are concerned that there are no proposals to measure changes in pesticide usage or risk.
- Success targets linked to the indicators have still to be agreed. The Agency is concerned that the signatories are seeking to back track on targets agreed in the original package of measures.

#### 1. INTRODUCTION

1.1 The Environment Agency welcomes this opportunity to submit evidence to the Environmental Audit Committee inquiry into pesticides: the Voluntary Initiative.

1.2 The Agency plays an active role in the Initiative as a member of the steering group overseeing progress; in assisting with a number of the individual projects; and in developing indicators of success.

1.3 The Agency believes the Voluntary Initiative provides an important opportunity for the crop protection and agriculture industries to demonstrate that they can control and manage their environmental impacts. Progress of the Initiative will inform policy-makers working on the implementation of new European legislation affecting farming.

#### 2. PROGRESS TO DATE

2.1 Most projects in the Initiative are making satisfactory progress. A notable exception is the development of Crop Protection Management Plans, which is a long way behind schedule. The National Farmer’s Union is leading this project. The NFU has had difficulties in producing a suitable plan that most farmers will be willing to undertake and yet will at the same time deliver significant environmental benefits.

#### 3. ENSURING UPTAKE OF MEASURES BY FARMERS

3.1 Most significantly, the signatories to the package have been slow in recognising the need to not only deliver project outputs such as improved training programmes but also to ensure that these measures are adopted by farmers. An Incentivisation sub-group has been set up to consider how a high level of uptake by farmers can be achieved. The work of this group has been poorly focussed and only recently, at the suggestion of the Agency, has it drawn on academics with experience of motivating farmers to adopt improved environmental practice.

3.2 An initial report of the group suggested using financial (grants) and regulatory incentives to improve uptake, both of which would no longer make the Initiative voluntary as required by Ministers. There has been inadequate consideration of the more difficult issue of motivating farmers to change practice without the use of such incentives.

3.3 A final report is still awaited from the Incentivisation group. The Agency has advised through the steering group that an implementation plan is needed for each project to identify the most effective ways of ensuring uptake.

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#### 4. MEASURING SUCCESS

4.1 Measuring the extent to which the Initiative has improved practice and delivered environmental benefits is vital if we are to be able to judge whether a voluntary approach is a viable alternative to a pesticides tax or further regulation.

4.2 Measures of success have still to be agreed. A draft set of indicators of farmer awareness, changes in practice, changes in levels of pesticides in the environment and reduced environmental impact has been put together. Some of these were proposed in the original package put forward by the signatories, others have been drawn from the work of the Pesticides Forum.

4.3 The Environment Agency has played a key role in this work and has proposed a format in which indicators may be reported. In drawing up the format it has become evident that no measures of pesticide use or risk to the environment are included in the proposed suite of indicators. Without such indicators it will be very difficult to make a link between changes in practice and any environmental improvements that might be seen. The Agency believes that it is vital that indicators of pesticide usage and risk are included.

#### 5. TARGETS

5.1 The original package of measures included a number of targets for farmer uptake of the various elements. Some of these targets, eg all spray operators to be members of a professional register by 2003, were ambitious and promised a large scale improvement in practice with resultant environmental benefits. They were one of the main reasons why the Agency supported the introduction of the programme as an alternative to a pesticides tax.

5.2 It has become evident in the process of drawing up success indicators that the signatories are now looking to back track on some of these targets since they now realise that they will not be met. The Agency recognises that the timescales for some targets may need to be extended because of slow progress of individual projects. However, we do not consider it acceptable to lower overall targets for the uptake of measures.

5.3 Targets should also be set for indicators of environmental improvement such as pesticide levels in water. At the moment the signatories are proposing that the target for all but one of the environmental indicators should simply be improvement, no matter how small. The Agency considers that more robust targets should be set that would deliver significant improvements in the environment.

#### 6. CONCLUSIONS

6.1 The Agency supported the package of measures at the outset because it believed that environmental improvements were likely to result if all measures were adopted to the extent that the signatories predicted. However, the lack of clarity of how farmers will be encouraged to adopt the measures and the apparent back tracking on targets for uptake reduce the likelihood that the Initiative will deliver these improvements. We believe that unless there is a commitment by the user community to specific objectives and associated targets it is unlikely that the Initiative will be successful. It is vital that these areas are resolved quickly. In addition, the Agency believes that measures of pesticide use or risk should be included as indicators of success.

October 2002

### Memorandum from English Nature

#### BACKGROUND TO WITNESS

English Nature is the statutory body that champions the conservation and enhancement of the wildlife and natural features of England. We do this by:

- *advising*—Government, other agencies, local authorities, interest groups, business, communities, individuals;
- *regulating*—activities affecting the special nature conservation sites in England;
- *enabling*—helping others to manage land for nature conservation, through grants, projects and information;
- *enthusiasing*—advocating nature conservation for all and biodiversity as a key test of sustainable development.

In fulfilling our statutory duties, we:

- establish and manage National Nature Reserves;
- notify and safeguard Sites of Special Scientific Interest (SSSIs);
- advocate to government departments and others effective policies for nature conservation;
- disseminate guidance and advice about nature conservation; and
- promote research relevant to nature conservation.

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Through the Joint Nature Conservation Committee, English Nature works with sister organisations in Scotland, Wales and Northern Ireland to advise Government on UK and international nature conservation issues.

#### INTRODUCTION

1. English Nature considers that a reduction in the burden on the environment from pesticides is essential in order to reduce the impacts and risks of pesticides to biodiversity and to the environment more. This should be achieved through a range of mechanisms, including regulatory, advisory, economic and voluntary measures. The Voluntary Initiative (VI) forms only one of a raft of necessary measures; to be effective it must be fully implemented and underpinned by a clearly stated Government strategy and action plan for pesticide risk reduction.

2. Restoration of farmland biodiversity requires action to counter the effects of agricultural intensification. Appropriately targetted reductions and selectivity in the use of pesticides should be part of that action, and should be part of the environmental benefits explicitly sought from the Voluntary Initiative. The study by the Environment Audit Committee is a timely review of the progress made by the Voluntary Initiative. It should make an important contribution to the broader debate about how policy instruments can be designed and used to help change farming practice, including achievement of these goals. In particular, firm links need to be made between the objectives and mechanisms for achievement in the Voluntary Initiative, and environmental outcomes sought from entry level "broad and shallow" agrienvironment schemes.

#### THE CONTRIBUTION OF THE VOLUNTARY INITIATIVE

3. The Voluntary Initiative must address the effects of pesticides on biodiversity both within the crop and in the non-crop environment. Within the cropped area, the objectives should be to reduce the risk of adverse direct effects of pesticides on important wildlife (such as rare arable weeds) and to reduce the indirect adverse effects of pesticides (which act by reducing the availability of wildlife food resources such as weed seeds and invertebrates). To achieve these objectives, the VI needs to contribute towards:

- (a) A reduction in unnecessary pesticide use.
- (b) Promotion of alternative methods for crop protection.
- (c) Selection of less environmentally damaging products.
- (d) Mitigation of the adverse effects of pesticides where their use is essential.

The key elements of the VI package which help deliver these objectives are:

- training programmes to improve understanding of risks and alternative methods of crop protection;
- improved information availability on the risks associated with pesticides;
- the development of individual Crop Protection Management Plans (CPMPs), including measures to mitigate for indirect effects of pesticide use such as unsprayed margins and beetle banks. At the moment, implementation of CPMPs is too underdeveloped and slow (see below).

4. Outside the cropped area, measures are needed which minimise the effects of pesticides on semi-natural habitats, such as hedgerows and watercourses, by reducing the risks of spray drift and run-off or leaching from the site of application, or losses to the environment during disposal. The Voluntary Initiative should help here through the following improvements:

- (a) Training and improved information on risks.
- (b) Encouraging the uptake of improved application technology and providing a scheme to improve the condition of crop sprayers.
- (c) Raising awareness of local habitats and species at risk through implementing Crop Protection Management Plans.
- (d) Promoting awareness of and compliance with measures to protect watercourses.
- (e) Implementing pilot stewardship campaigns for the protection of water within catchments.

The focus of the VI over the past 18 months has been on the development of these programmes, and there is as yet limited take up of relevant programmes on farms. An acceleration in the rate of implementation is required if we are to reduce the risks to biodiversity. We are concerned about the time it is taking to achieve change.

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PROGRESS AGAINST THE VOLUNTARY INITIATIVE OBJECTIVES:

5. *Training and awareness:*

Improved awareness of risks to the environment is an essential part of the programme. The VI addresses this issue well, with programmes for training or training standards directed at operators, adviser/distributors and, importantly, farmers themselves. The initial survey of current practice carried out under the VI has been useful in identifying significant gaps where training must be strengthened. Willingness of training and certification organisations to take part has been encouraging. It is disappointing that due to delays in development of Crop Protection Management Plans (CPMPs) the development of key training modules has been delayed. Interim targets for the completion of training modules and take up of training need to be agreed urgently.

6. *Environmental information:*

Better availability of environmental information on pesticides has long been necessary, and the development of Environmental Information Sheets and further information on insecticides is an important part of the VI programme. The advisory material must fully reflect likely risks. Whereas action to address the rate of production of the Environmental Information Sheets is in hand, we are concerned that some areas of potential risk are not well-covered (such as indirect effects on biodiversity). Some areas of provision of environmental information therefore need further work.

7. *Crop Protection Management Plans:*

7.1 We regard the CPMPs as critical for delivery of the biodiversity benefits from the VI. They will provide the primary mechanism whereby a farmer or his adviser will identify specific risks to biodiversity on the farm (as well as risks to water quality) arising from his crop protection practice, and will enable evidence to be gathered on whether measures have been taken to address those risks. Particularly important is the requirement for the farmer to identify measures to compensate or mitigate for the indirect effects of pesticides on farmland biodiversity, for example the effects of broad spectrum herbicide and insecticide use on food availability for farmland birds. Possible options for mitigating measures that the CPMP should explicitly identify might include conservation headlands, wildflowers strips and beetle banks.

7.2 Progress with the CPMPs has been unsatisfactory. Although the components of the CPMP are broadly accepted, key issues that still need to be finalised are mechanisms for both assessing and encouraging or incentivising their adoption and implementation. There is a significant opportunity here to build links between the VI programme and the entry-level "broad and shallow" agri-environment scheme. Given the intention to make the entry level "broad and shallow" scheme widely available to farmers, this could act as an effective incentive for farmers to take up the mitigating measures under the CPMPs, such as those outlined above. Correspondingly, the requirement for such action under the VI should encourage farmers to look more widely for opportunities to adopt measures to enhance biodiversity under such a scheme as the "broad and shallow".

8. *Incentivisation*

Incentivising or motivating farmers to adopt the package as a whole remains a concern. Final recommendations on incentivisation have yet to be confirmed by the Steering Group and there is still uncertainty as to the effectiveness and likely comprehensiveness of mechanisms proposed. It is likely that uptake of individual components of the package could be best incentivised by different means. In the view of English Nature there is still further scope for distributors and suppliers to consider their own role in assessing the uptake of measures at the individual farm level, and in encouraging the adoption of practices which are potentially less damaging to the environment. Our concerns over whether the package will be taken up sufficiently to make a difference remain and to some extent this concern has been strengthened by the slow rate of progress on this issue over the past year. Agreement over a practicable incentivisation scheme and close monitoring of progress against interim targets must be a priority for the Steering Group.

9. *Indicators and targets*

Although progress has been made on agreeing a range of appropriate indicators of the progress of the VI, agreement has not yet been finalised over the targets that will indicate success. A range of response indicators has been selected which relate closely to the actions under the VI, however it is the environmental indicators that will be particularly crucial in gauging its success. The complexity of the interactions between most environmental parameters and pesticide use, as well as the lack of good baseline data for other potentially suitable indicators against which progress may be measured, place limitations on the environmental indicators which can be adopted now. The current range of proposed environmental indicators has been

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developed from those adopted by the Pesticides Forum, which has recognised the need to develop additional more specific indicators than those currently available. The way in which this issue has been explored through the Pesticides Forum has presented some difficulties for the government departments involved. It is important that rapid progress is made in developing additional environmental indicators, as well as indicators and targets for changes in product usage patterns so that effective indicators of changes in environmental burden are put in place.

#### 10. *Biodiversity Officer and Strategy*

The appointment of the biodiversity officer and recent draft strategy are welcome aspects of the programme. There is potential here for greater involvement of individual companies in UK BAP for farmland habitats and species, which we welcome. Real commitment is needed by individual companies to make progress against targets, which should include further commitment to biodiversity considerations in product stewardship and product development/manufacturing.

#### 11. *Cost of the package*

Accounting for the costs of the individual components of the VI has not been adequate to enable assessment of progress against the forecast costs of around £11 million per annum to the farming sector, and £2.4 million per annum for the CPA member companies. At present it appears that expenditure has been less than that planned at the outset, although delays in starting projects and in transferring programmes out to individual farmers may account for this. It is essential that accounting and reporting procedures are tightened up in order to enable the Steering Group to monitor more closely the projected and actual costs of the package, and that these are commensurate with the scale of potential problems. The scale of change that could be achieved by reinvesting the potential take from a pesticides tax is an important criterion in evaluating whether the scale of delivery is sufficient.

#### THE NEED FOR A WIDER POLICY FRAMEWORK

12. We consider that the Voluntary Initiative must be part of a coherent package of measures to reduce the adverse impact and risks of pesticides in the environment. Government policy on pesticides currently is aimed at the promotion of responsible use and reducing the impact on the environment. English Nature believes that this policy should be strengthened and broadened as an explicit risk reduction strategy with an overall government action plan. This should take into account wider policy initiatives such as those to increase the area farmed organically and reductions in the range of pesticides available following the EU pesticides' review programmes. Where voluntary measures are not succeeding, or where there is evidence of failure to comply with statutory requirements, there must be a clear commitment by Government to increase surveillance and enforcement activity.

#### CONCLUSIONS

13. English Nature's overall view is that the measures contained within the Voluntary Initiative could change farmers' behaviour and lead eventually to measurable environmental and biodiversity benefits, but only if widely taken up. This voluntary approach has been slow in development, and it is still uncertain whether it will deliver the required benefits. Although it is probably too early to say that the Voluntary Initiative cannot deliver up to expectations, there are certainly risks in waiting much longer. Baseline standards for agriculture and "broad and shallow" schemes under the agrienvironment programme offer an opportunity to help drive forward measures under the Voluntary Initiative.

14. The present Environment Audit Committee review should give renewed momentum to the Voluntary Initiative, and we recommend that:

- (a) The process is reinvigorated and driven harder by the Steering Group.
- (b) The actions identified above are progressed.
- (c) Government adopts a stronger policy framework within which the Voluntary Initiative should sit.
- (d) Progress should again be assessed at the end of 2003.

Government should make it clear that it is determined to act if the voluntary approach fails to deliver and the threat of a pesticide tax should remain as an alternative approach. A possible future consideration might be to introduce a tax for those who do not take up the Voluntary Initiative.

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**Annex A**

**ENGLISH NATURE POSITION STATEMENT ON THE USE OF PESTICIDES AND  
VETERINARY MEDICINES IN AGRICULTURE**

The use of pesticides to control crop pests, weeds and diseases, and of veterinary medicines to protect livestock health, continues to give rise to concerns about effects on wildlife for a number of reasons:

The extensive use of pesticides has, together with other changes in farming practice, contributed to significant declines in the numbers and diversity of insects and wild plants in farmland. By affecting their food supply, this indirect effect of pesticide use has contributed to serious declines in the populations of farmland birds.

Wildlife of semi-natural habitats including watercourses, hedgerows and SSSIs, can be damaged by pesticide drift or over-spraying, and by the use or disposal of veterinary medicines such as sheep dip and fish farming medicines.

Local populations of rare species including some birds of prey are at risk from the misuse or deliberate abuse of pesticides and veterinary medicines.

The approved use of pesticides still leads to occasional incidents of wildlife mortality. There is a need for continued vigilance over this, and for an improved understanding of the consequences for wildlife populations of exposure to sublethal concentrations of pesticides and veterinary medicines.

English Nature recognises the dependence of current farming practice on pesticides and veterinary medicines to deliver the productivity, quality and animal welfare standards required. However, although the total weight of pesticides used has generally decreased, the area treated (especially in arable crops) and efficacy of products has continued to rise, and there is scope for reducing routine use. English Nature believes that it is important to reduce further the impacts and risks to biodiversity caused by the use of these products.

The objectives of English Nature's policy are to promote the restoration of the characteristic wildlife of agricultural habitats, especially priority species in the Biodiversity Action Plan, and to protect semi-natural habitats (including SSSIs) and non-target species from the adverse effects of pesticide use. Restoration of farmland biodiversity requires action to counter the effects of agricultural intensification. This will include appropriately targeted reductions and greater selectivity in the use of pesticides, together with other changes in agricultural practice achieved through changes in agricultural and land use policy. English Nature will encourage the following measures which include reductions in pesticide use targeted to optimise benefits for wildlife, and will favour policies and agricultural production systems under which these measures are promoted. These measures fall into three broad groupings:

- (a) A strong regulatory and enforcement process must be maintained for pesticides and veterinary products. English Nature supports the approvals system in its aim of minimising the risks of adverse effects. However, the process of regulation currently fails to address fully the requirements to protect and restore farmland biodiversity. English Nature will:
- press for the assessment of indirect effects, such as changes in food availability for declining farmland birds, in the regulatory process for pesticides and veterinary medicines, and promote a range of approaches to compensate for such effects;
  - press for the establishment of an institutional framework that ensures that the development and uptake of new technologies for crop production does not have adverse direct or indirect effects on biodiversity through changing patterns of pesticide use;
  - advise the Pesticide Forum and the Advisory Committee on Pesticides on the environmental effects of pesticides. Encourage a fuller assessment by regulatory bodies of the scale and patterns of use of all pesticides and veterinary medicines, and of the progress of the Government's policy for minimising pesticide use;
  - press for wider monitoring of pesticide impacts in terrestrial and freshwater environments, to include taxa which are currently not monitored under existing schemes;
  - carry out, promote and advise on research into the impacts and risks of pesticide use on wildlife populations, in association with government and environmental groups;
  - support the work of the regulatory bodies and others in investigating pesticide incidents and in prosecuting offenders.
- (b) To maximise the contribution of a pesticide policy to achieving government's targets for farmland biodiversity, pesticide minimisation programmes are required which have this clear objective. A reduction in the impact of pesticides, as a component of wider measures to achieve biodiversity targets, will require the use of more selective products, more targeted applications, and greater use of non-chemical means over wide areas of farmland. English Nature will:
- help to develop and promote the wider availability and improved uptake (including increases in funding) of schemes designed to reduce the impact of indirect effects of pesticides;

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- promote the development and uptake of alternative methods of controlling pests, weeds and diseases. This would particularly involve the promotion of approaches such as organic farming, Integrated Farming Systems, and farm produce assurance schemes, where these approaches can be shown to benefit wildlife;
  - in association with the crop protection industry and bodies such as MAFF, the Farming and Wildlife Advisory Group and the Environment Agency, help to develop and promote improved information for users and advisers on the environmental effects of pesticides;
  - support the adoption of economic measures which discourage unnecessary pesticide use, and encourage greater use of more selective products.
- (c) A precautionary approach is needed to minimise the risk of adverse effects on semi-natural habitats from the use of pesticides and veterinary medicines. English Nature will:
- promote measures, in association with advisory bodies and regulators, to minimise pesticide drift and more closely confine pesticides and veterinary medicines to the intended target; and to reduce the risks arising from their disposal;
  - develop further the use of appropriate no-spray zones for pesticides around sensitive sites and habitats, seek strict adherence to Codes of Practice to protect semi-natural habitats, and seek further legislation where voluntary measures are failing;
  - provide advice, where appropriate, to owners, occupiers, contractors and regulatory bodies on the risks of pesticides and veterinary products in or near SSSIs and other sites of wildlife importance, and seek to develop and promote alternatives to herbicide use in the management of NNRs and SSSIs where possible.

*March 2000*

#### **Memorandum from the Royal Society for the Protection of Birds**

The Royal Society for the Protection of Birds is grateful for the opportunity to give evidence to the Environmental Audit Committee as part of its enquiries into the progress of the Voluntary Initiative. The RSPB is concerned about the impacts of pesticides on wildlife and the wider environment, and seeks to identify and reduce these impacts wherever possible.

#### **PESTICIDE IMPACTS ON FARMLAND BIRDS**

Regulatory improvements have greatly reduced the direct toxic effects of pesticides on birds to a point where direct effects of legal applications of agricultural pesticides are now of low conservation importance. The major concern regarding pesticide impacts on farmland birds relates to their potential to disrupt food-chains, the so-called indirect effects of pesticides.

The insecticidal and herbicidal properties of pesticides remove non-target insects and plants from sprayed crops. Most birds feed their chicks on insects, and insecticide sprays, particularly during the breeding season, can remove these essential food sources. Herbicides remove plants and the over-winter food they provide in the form of seeds, and also affect invertebrate food supplies by removing the host plants they live on. As well as the impacts on birds, these plants and insects may of course be ecologically important in their own right.

Research on indirect pesticide impacts is a relatively new field, but evidence is accumulating. Pesticides have been shown to be the key factor in grey partridge declines, and impacts on corn buntings, yellowhammers, turtle doves and skylarks have also been identified in recent research. On balance, although not all species are affected and pesticides are only one of a number of factors which affect farmland birds, there is widespread acceptance that the Government's Public Service Agreement to reversing the farmland bird indicator, and over 20 BAP targets, will not be achieved without a reduction in the indirect effects of pesticides.

#### **THE RSPB'S POSITION**

The RSPB has supported the introduction of a pesticide tax, and two years ago gave evidence to this effect to the Environmental Audit Committee's review of green taxation. The RSPB's position continues to be that a banded tax accompanied a package of measures to promote better pesticide management, funded through hypothecated revenues, is an effective and socially justifiable means by which to secure pesticide impact reductions and implement the polluter pays principle. However, we have always acknowledged that taxation is not the only approach and that RSPB will support an alternative route provided it can deliver equivalent environmental benefits. For this reason, the RSPB has accepted a place on the Voluntary Initiative steering group, with the aim of continuing to support the content and implementation of the package. Should genuine environmental improvements fail to emerge within a reasonable period of time, the RSPB will advocate a pesticide tax as above.

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#### REDUCING THE ENVIRONMENTAL IMPACTS OF PESTICIDES: THE VOLUNTARY INITIATIVE

In order to meet its environmental targets, the VI will need to effectively reduce biodiversity and water impacts of pesticides. We will restrict our comments here to biodiversity, although the RSPB is involved with and supports the water quality aims of the VI.

To reduce indirect pesticide impacts on biodiversity, the VI will need to address:

- The removal of bird food during the chick-feeding season (ie protect non-target spring and summer insects and the plants they live on).
- The removal of over-winter bird food (ie leave non-target plants to set seed).
- Direct removal of important plants and invertebrates (ie avoid killing rare or declining plants and invertebrates).
- Destruction or damage to non-cropped habitat adjacent to farmland (ie keep pesticides in the crop).

The RSPB is satisfied that the VI has suitable projects within its portfolio to address these critical issues. Success will depend on the effectiveness with which the projects are implemented.

#### *The value of the VI*

The VI is valuable in that it is uniting elements of the industry with a common aim, and fostering a sense of responsibility for the impacts of routine activities. The concept of duty of care has not been enshrined in most agricultural policy, which has depended on a combination of externally imposed sticks and carrots to guide agricultural activities. If the industry can prove that it is capable of responsible self-regulation in the matter of pesticides, it will send a significant message that it is moving towards the vision set out in the Curry Report and endorsed by Government, of an agriculture which is reconnected to and rewarded by society's wider needs and priorities.

On a more practical level, steps to mitigate the impacts of pesticides on the environment are likely to be more effectively implemented if they are owned by farmers, agronomists and pesticide companies, rather than imposed on them. Many of these same activities would be necessary if the VI were discontinued and a pesticide tax imposed.

Individual areas of the VI have already delivered value and reflect a high level of commitment by different industry participants. In particular, the re-organisation of the BASIS and NPTC training syllabuses and certification registers, the farm practice surveys, and communication and liaison within the industry and to the farming media stand out as achievements.

#### *Concerns with the VI*

The effectiveness of the VI rests ultimately on pesticide users undertaking the activities under the VI umbrella. To date, it is not clear how this will be achieved for a number of key projects, although progress is well advanced with others. Two particular areas of concern emerge:

- Exactly what farmers will be asked to do: Crop protection management plans were envisaged as the means by which all pesticide-related activities on a farm were co-ordinated and rationalised. Some discrete parts of this, such as sprayer testing and filling, are well advanced. An appropriate range of issues to be covered has been agreed, but it is still not clear specifically what a plan will deliver for the environment on each farm. The plans are likely to cover legislation and good practice, including LERAPS, Green Code and training activities, but are not likely to extend beyond this into activities which directly compensate for pesticide impacts (eg: planting wild seed mix to compensate for broad-spectrum herbicide applications). This is the kind of activity which could have been funded through tax revenues. Instead, heavy reliance is being placed on participation in agri-environment schemes.
- Exactly how farmers will be helped to do it: It remains unclear exactly what financial resources have been allocated to implementing the VI. The final report of the incentivisation sub-group has yet to be agreed by the steering group. As stated above, much will depend on securing wider ownership and full implementation of the VI in the farming community, and it is not yet clear exactly how this will be secured on a project by project basis.

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#### THE ROLE OF GOVERNMENT

Ministers in Treasury and DEFRA have retained a close interest in the VI. Understandably, Government is regarding the VI as a test of the industry's ability to deliver sustainable pesticide use, and so is not involved in a hands-on way. However, representatives of key departments observe VI meetings and provide an appropriate level of scrutiny and input. It is the RSPB's perception that continued pressure, in the form of interest in a pesticide tax, may be necessary to keep the VI on course, as this appears to have been the most powerful incentive in getting parties to agree important deliverables.

Many of the activities of the VI could be regarded as the remit of central policy, and the VI signatories originally hoped for more of a partnership with Government. There remains the question of whether some of the VI's aims can be achieved without central Government involvement and, if not primary legislation, at least a formal tie into related policy areas (particularly cross-compliance and agri-environment). As stated above, if the pesticide tax were revisited many of the VI activities would need to continue under Government leadership. The RSPB believes that the Government should consider further how sustainable pesticide use sits within its wider policy for sustainable agriculture, and the future of its dissociation from the activities of the VI.

#### IN SUMMARY

To date, while we are confident that it has the potential to do so, it is unclear yet whether the VI will be successful in reducing the environmental impacts of pesticides. The value of the VI, in terms of building commitment and a sense of ownership of the need to reduce the impacts of pesticides, should be recognised and fostered. Further attention on the specific environmental gains to be delivered at a farm level, and the means of achieving them is needed.

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#### **Memorandum from Dr Robert Breach MBE on behalf of Water UK**

Water UK welcomes the opportunity to participate in the Inquiry by the Environmental Audit Committee on the Pesticides Voluntary Initiative. As requested we set out below a short memorandum of key points which we would of course be happy to follow up in more detail during the Panel session.

#### THE INTERESTS OF THE WATER INDUSTRY

The recently reaffirmed European Union standard for pesticides in drinking water is extremely strict at 0.1 ug/l (1 part per 10 billion) This is effectively a surrogate for zero which applies to all pesticides irrespective of their individual toxicity.

Under UK legislation water suppliers are expected to assess and monitor the risks of pesticide contamination of their raw water sources and, if these cannot be controlled by the pollution control authorities, introduce extremely expensive treatment to ensure that the water supplied to customers meets the standard at all times and in every sample of drinking water.

Extensive monitoring by the water industry has demonstrated that many raw water sources are significantly affected by pesticide contamination in excess of the 0.1 ug/l drinking water standard. This in turn has necessitated significant investment in pesticide removal plant at a cost estimated at up to £1 billion over the last 10 years with ongoing operating estimated at £100 million per year. Such an approach is not consistent with the Polluter Pays principle or emerging EU legislation. Neither is it in accordance with sustainable best practice For that reason water companies have been working with the crop protection sector and others to find ways that this pesticide contamination can be significantly reduced or even eliminated.

#### PREVIOUS PESTICIDE STEWARDSHIP CAMPAIGNS

The Water industry has worked collaboratively with the crop protection industry for many years to support, develop and promote pesticide best practice stewardship campaigns. In addition individual water companies have worked with other users of pesticides, particularly within the local authority and transport sectors to reduce pesticide contamination associated with run-off from hard surfaces. In the non-agricultural sector there have been some encouraging signs of progress and, while problems can still occur, generally this is not considered to be the major source of pesticides now detected in raw water resources.

For water suppliers, the primary problems of pesticide contamination of water resources are now overwhelmingly associated with a relatively small number of herbicides in widespread use on cereal crops and grassland and at relatively high approved label application rates. Despite the best efforts of the pesticide

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stewardship campaigns the levels of these pesticides in water supply abstractions have not substantially reduced and in some cases, due probably to weather related factors and/or changes in agricultural practice, levels of contamination may even have increased in some areas.

#### THE WATER INDUSTRY VIEWS ON A PESTICIDE TAX AND OTHER CONTROL MECHANISMS.

The water industry has been consistent in not supporting a pesticide tax. This is not because of any general opposition to such economic instruments as a means to achieve environmental policy, but rather that we simply do not believe the pesticide tax as proposed will have any beneficial impact on reducing pesticide levels in the environment. Indeed there is a risk that if such a tax was imposed pesticide levels for certain products could actually deteriorate.

This is largely because those pesticide products which are of most concern to water suppliers are relatively cheap to purchase. Because of their effectiveness in crop protection they would still continue to be used widely if a tax was imposed. Indeed, perversely a tax might shift usage patterns away from some of the newer but more expensive products with lower potential environmental risk towards use of the older cheaper products with higher risk. There is also a concern that faced with a tax, farmers and other users of pesticides will give up existing voluntary good practice measures to protect the environment on the grounds that they have already paid for any damage caused.

For these reasons the industry has always been a strong advocate of a twin track approach to controlling pesticides based on:

- (1) a clear and transparent regulatory system that recognises water protection issues; and
- (2) backed up by effective voluntary measures.

We have been a strong supporter of the Voluntary Initiative (VI) which we believe has the potential to be much more effective than previous stewardship campaigns in reducing pesticide levels in the environment. However, if, regretfully, the VI does not result in the significant reduction of contamination of our raw water resources then we believe we would have no option but to call for stronger regulatory control of many products, including potentially bans on the use of the most problematic pesticides.

#### THE VOLUNTARY INITIATIVE(VI) AND WATER PROTECTION

The water protection element of the VI is seen to be a key part of the overall VI programme for a number of reasons. These include the fact it is potentially easier to demonstrate the effectiveness or otherwise of the measures that are being put in place when compared to other positive environmental outcomes. In addition the way that the water protection project is being deployed as part of the VI, provides an opportunity to trial many of the other elements of the VI in order to test their effectiveness.

Under a national Steering Group, the water element of the VI is being developed through six pilot catchments within which local project teams have been established with representatives from all the VI signatories including particularly local farmer representatives. Water company representatives are a key part of the project team and are working with their partners to develop specific local improvement targets for pesticide reduction.

#### PROGRESS IN THE PILOT CATCHMENTS AND ISSUES SO FAR IDENTIFIED

The pilot areas have been chosen to representative a range of different problems and include both river, groundwater and upland catchments. They meet a number of criteria including a known history of pesticide contamination at water supply intakes, but also being small enough to be manageable. In each case a sequence of actions is being put in place which will be rolled forward and reviewed each spraying season in order to further assess and optimise the effectiveness of the measures being deployed. As far as possible all communication material is being badged under the VI logo using a standard format but locally adapted to reflect the specific local issues. The general approach can be summarised as:

1. Confirm the pesticide problem and it's likely cause.
2. Significantly increase awareness and ownership of the problem by farmers, operators and their advisors.
3. Develop simple but effective guidance for farmers on measures that they can take to further reduce pesticide leaching based on both:
  - (a) Improved mixing and application practice.
  - (b) Improved choice and timing of crop protection chemical.
4. Communicate the proposed solutions to all users in the catchment, including consideration of improved technical support on how rainfall and other weather related factors can affect the risk of water contamination.

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5. Monitor the effectiveness of these measures in reducing pesticide levels in raw Drinking water.

This cycle of activities will be put in place each spraying season. At the end of the season the pesticide monitoring results will be assessed against the changes in practice that have been adopted in order to assess their effectiveness, taking account other relevant factors such as rainfall patterns.

Key to supporting this initiative is the expertise of local agronomists. We have therefore made significant efforts to include them as an integral part of the process for communicating best practice and also assessing the effectiveness of those actions at the end of each spraying season.

The early phases of the VI took longer to establish than was hoped because of the scale of organisational infrastructure that needed to be put in place. However, after a considerable amount of work by many people a significant degree of momentum is now being established across the pilot areas. Nevertheless a number of learning points have already occurred in rolling out the pilot. These include:

1. Gaining access to a complete database of all pesticide users in a particular catchment, which has proved to be extraordinarily difficult, in part because of data protection and confidentiality issues.
2. Identifying the most effective way to communicate to all farmers/pesticide users in order to engage their co-operation.
3. How to ensure that best practice is disseminated in a way that is simple, meaningful and useful both to the sprayer operator and also to the crop protection decision-maker.
4. A particularly crucial new development has been a pilot risk-based decision tree for choosing when and when not to apply certain crop protection products linked to weather conditions. This is based on a "traffic light" system underpinned by a proposed technical support service that provides early warning of rainfall and soil moisture conditions which might trigger high levels of pesticide run off after application.

#### SUMMARY

After a slow start the VI is gaining momentum, and particularly in the water protection element, is showing a very significant degree of co-operation and willingness to make it work. The challenge is however daunting. We believe that the technical knowledge exists to significantly reduce the current level of water contamination from pesticides. The test is whether we can find ways to incentivise and encourage the application of this knowledge by every single pesticide user.

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#### Examination of Witnesses

DR ALASTAIR BURN, English Nature, DR PAUL LEINSTER, Director of Environmental Protection, Environment Agency, DR SUE ARMSTRONG-BROWN, RSPB and DR ROBERT BREACH MBE, Water UK, examined.

Chairman: Gentlemen, can I thank you very much indeed for letting us have the separate memoranda which we have received from each of your organisations. Can I thank you for coming today and also can I thank you, as I did your predecessors, for coming together as a group. It does enormously help us to get through these issues with reasonable speed and we want to do that as well as recognising the importance of these issues at this particular point in time. Is there anything you would like to add by way of an introduction before we begin cross-questioning you?

(Witnesses decline)

Chairman: Thank you very much indeed. That is also very helpful. Mr Barker, you want to lead off.

#### Mr Barker

58. Yes. Thank you. Dr Breach, to what extent do you share the same interests as the environmental organisations represented by the lady and two gentlemen on your left in terms of the range of pesticides that you want to see minimised or are you just concerned with a few of them?

(Dr Breach) I think we are very aligned in the sense that we take our water from the environment and therefore the healthier the environment the better it is in terms of our ability to treat the water supply to customers. So in terms of general environment protection I think our views are totally aligned. In terms of the pesticides which cause the water industry problems; as we have said in the evidence, it is limited to a rather small number and I think this is particularly relevant because the standard in drinking water is not toxicologically derived; it is effectively a surrogate for zero. Therefore the pesticides which cause the water industry particular problems are those which are in widespread use, mainly in cereal and grassland management. They are not particularly eco-toxic but they cause the water industry enormous problems in having to treat at great cost and, may I say, very unsustainably, using lots of energy to allow the drinking water standard to be met in all the supplies we provide.

59. Can you tell me about the farmers in the pilot water catchment areas? Can you tell us what progress you are making there in actually identifying them?

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[Continued

**[Mr Barker Cont]**

(Dr Breach) Yes. We have had one of the things we said we would produce for the Initiative, in fact it has only just been produced but I am happy to provide it to this Committee, a pack of information which is going out this week in the pilot catchments which is giving very targeted advice on what the problem is and what some of the solutions are deemed to be. It is very important for us that this is produced by farmers. The letter is signed by the local farmer champions and they are using language which they believe will communicate effectively to the farmers in their catchment, in other words their colleagues in the catchment, because a lot of the issues are much better solved if they are targeted at the particular catchment. The problems and the solutions may well vary slightly between catchments and that is why we have chosen the six different catchments which represent different problems. They are all demonstrably causing pesticide problems to water suppliers. A lot of the solutions are the same but the targeting has to be particularly focussed and sold by the local farmers to their colleagues.

60. What percentage uptake amongst farmers do you need to actually achieve that? How are you incentivising them and how confident are you actually that you are going to get that?

(Dr Breach) I think your questions have really fingered the whole issue here, which is that really to be effective we want a very high level of uptake because only one misuse, or shall we say inexperienced use, could still cause us very significant problems.

61. Could you just quantify that?

(Dr Breach) Well, I can quote particularly an example of one of our reservoirs where a particular herbicide had a very significant effect. We never traced the cause of it but we believe it was probably misuse by one particular person, because you only need perhaps a few kilograms of product to cause a major problem for water suppliers. The standard is extremely strict and it does not need much pesticide to cause a real problem for water suppliers in terms of treatment.

62. So how are you going to incentivise the farmers to take part?

(Dr Breach) I think it is the nub of the question which I am sure some of my colleagues and some of the people earlier have mentioned. The whole point of the Voluntary Initiative is to create incentives for farmers to do the right things and hopefully disincentives to do the wrong things. I suspect that the knowledge about what to do, the right things, is there. We have the technology, we have the knowledge. The key to it is actually finding the right sort of incentives to make all farmers and all users of pesticides do that. I think I would support the comments earlier that it is not just the big farmers, it may be the occasional user who causes as much problem as the very experienced users with bigger applications.

63. So what do you think the key incentives are? I am still not absolutely clear on that.

(Dr Breach) I think you really have to ask the farmers. We talk to farmers, but I am not a farmer. We are looking for a step change, we are looking for a culture change. It is about using the right products

and using them at the right time. One of the initiatives, for example, that is taking place is giving much better advice on when and when not to use certain products because it is particularly influenced by things like rainfall and the conditions of the soil. One of the things we are piloting this autumn—and I have an example of it—is a decision tree, a traffic light system, very simple, backed up by advice to agronomists, which says, “If these are the weather conditions then you should not use, for example, Isoproturon.” In the past that advice was not there and many of the problems, we believe, is because people used the product at the wrong time, in other words when it was very heavily raining and therefore you get a massive run-off of excess pesticide into the river.

Mr Barker: Thank you.

**Mr Jones**

64. Listening to your description of the potential severity of a problem which might be caused by simply one irresponsible or ignorant farmer, is this something that you see mainly as a policing issue rather than as either a taxation one or one which is answered by some sort of voluntary initiative?

(Dr Breach) I think policing is perhaps the wrong phrase.

65. If you say that the result of one person's activity could cause your industry many millions of pounds worth of damage and cost, in almost any other field of civic society that would be regarded as a policing issue?

(Dr Breach) I think part of the problem is lack of awareness, lack of education. We have talked much more intensively for the first time to farmers, to agronomists in the catchments and many, for example, did not even appreciate there was a water supply intake downstream of their farm. They did not appreciate that what they thought was perfectly acceptable practice was causing us a problem. So I think we have to firstly get an understanding and ownership of the fact that there is a problem and that was one of the first issues. If you can get that ownership and acceptance then you can start providing solutions, we hope. I think you have to have the balance of sticks and carrots. My general experience is that carrots are very powerful but you also need a few sticks as well. I think the trick for all of the Voluntary Initiative and indeed Government policy more generally is to get the right combination of carrots and sticks.

**David Wright**

66. This is a quick one. Is there not an issue here about changing land use patterns and practice as well in terms particularly of run-off? Dr Leinster, I do not know whether you want to comment on that? There is a need for us to re-examine how we are actually using our land, is there not?

(Dr Leinster) Yes, I think there is. But just on the general point that has been raised, I think the Voluntary Initiative is a test case as to whether an industry-led approach can deliver environmental improvements without the need for regulatory or fiscal measures and I think, as was described by the

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[Continued

[David Wright Cont]

previous group in their evidence, time has to be given to see whether or not this voluntary approach will deliver. I think one of the difficulties with policing is the chance of catching the bad practice would require such a high level of surveillance that you might not find it. I think what we need to have a look at is how do you get people doing the right thing. So the first thing that has to happen is people need to know what is the right thing to do, so there needs to be education and awareness. Then by those means you see whether or not you are going to deliver this change in practice, which we hope will occur. I think down the road if the education and awareness does not deliver then maybe at that stage we need to look at alternatives. In terms of the awareness, I think, as Bob was saying, we need to give people awareness about when do you spray, when do you not spray, what happens if you have got this type of land or that type of land, and I think it is site-specific information which is important, site-specific risk assessments and the provision of that information. Bringing all that together, I think there is a chance that this can work.

**Mr Thomas**

67. Widening out a little bit from water now and looking at the earlier evidence we have received around Crop Protection Management Plans, we have heard that the basis of them has just been agreed. How do you view those proposals? I suppose I am mainly asking the NGOs, if you are almost an NGO. I do not know whether you are an NGO or not. An environment agency, slightly NGO flavoured agency. How do you view those proposals now and do you think there is a realistic opportunity or a realistic chance really of getting farmers to sign up to them on a voluntary basis?

(Dr Burn) Can I make a start on that? I think we are quite please about what the broad content is. They cover the right breadth of issues. They deal effectively, in principle at any rate, with crop protection practice, the broad compliance of the Codes of Practice, the protection of water and the protection of biodiversity and there are components within that which should really make a difference in each of those areas provided farmers do what is required. I think what we have seen so far though is, if you like, the content of a Crop Protection Management Plan which would effectively scale the degree of importance given to what farmers should be doing on each of those areas but so far not really any concrete idea about how those will actually be delivered. So what actually do you tell the farmer to do if he scores a 5 under a particular thing, or what actually is a farmer encouraged to do if he scores a 4 under protection of water? So good, they have got the right sort of components. The real issue is, how are they going to be picked up? There is some encouraging development, I think, in relation to how Farm Assurance Schemes might effectively give some way of encouraging their adoption. From our own point of view one of the key elements within them, though, is what farmers do to mitigate for the almost inevitable consequences of using pesticides within the crop. In other words, I need to control weeds, I need to control pests and one of the consequences of that is I am going to deprive birds of weed seeds and

invertebrates. What can I do to mitigate for that? Within the Crop Protection Management Plan you would identify a number of possibilities including things like conservation headlands, beetle banks, and so forth. What needs to be tied up is how you incentivise farmers to adopt those particular elements and I think that is a key part of the Crop Protection Management Plan. In our view the broad and shallow scheme, for example, could provide one form of incentive for that particular component of the management plans.

(Dr Armstrong-Brown) We have a very similar position to the one Alastair has just outlined. The Crop Protection Management Plans are seen by the RSPB as being a crucial part of the package and one which we are very keen on seeing going in. The reason for that is that this planning element has been missing so far, as far as we can see, from some of the routine legitimate use of pesticides and it is that planning element which will enable a more intelligent approach to pesticides to be put across to farmers. But as Alastair has outlined, the concerns that we have are the specifics of what a plan will deliver. A farm could have a plan but could continue with poor practice unless there is some form of mechanism to aim farmers at the top end of the planning process.

68. So would you say at the moment if a farmer went into a Crop Protection Management Plan but he or she was not part of any other agri-environmental scheme they would not necessarily have the tools or the training to actually deliver the objectives of that plan? Is that a fair assessment?

(Dr Burn) No, I think the training should be there. The training element is, if you like, through other parts of the Voluntary Initiative so that should be there. It is more to do with the incentives to do what would otherwise possibly be a costly part of the programme.

69. But those incentives could come in other agri-environmental schemes, could they not? I am just thinking of your colleagues, for example, in Wales. The Countryside Council for Wales actually runs the agri-environmental scheme for Wales.

(Dr Burn) That is right.

70. So you could see a situation happening in Wales which would be different to England, possibly, in that you would have much more of a cross-reference between a farmer going into an agri-environmental scheme and a farmer trying a Crop Protection Management scheme? Not that there are many crops in Wales, now I come to think of it, so I do not know whether we are quite going down that line, but there we are. What I am really trying to get at is whether the incentives are really within the voluntary scheme itself or whether the whole scheme really depends on these external incentives, whether it is an agri-environmental scheme, whether it is a mid-term review, whether it is the Curry Report proposals. Have we got enough in this Voluntary Initiative to incentivise the farmer to go for these Crop Protection Management schemes and other elements of the Initiative as well?

(Dr Burn) I should make it a bit plainer. I think the role of schemes like broad and shallow really should be focussed at those particular elements which are difficult to deal with in other ways.

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[Continued

**[Mr Thomas Cont]**

71. That scheme does not exist yet.

(*Dr Burn*) That does not exist yet but these issues still all need to be explored. So, as I said earlier, we have got the matrix, if you like, of a Crop Protection Management Plan. We still lack how it is going to come forward—

72. We cannot wait for the broad and shallow scheme, can we? We must see these plans being workable now, surely?

(*Dr Armstrong-Brown*) Can I make a suggestion there? The broad and shallow scheme will contain a number of things—I sit on the steering group which is designing it—which will also be highlighted in the Crop Protection Management Plans but, as you say, it will not be widely available in England until 2005. The existing agri-environment scheme contains many of the same measures but there are restrictions on uptake there because of budgetary reasons. So they do provide a real and useful incentive tool but they are one of a range of incentives, some of which are external to the VI and should be embraced by the VI and there are efforts going on to make sure they do. But the VI itself needs also to be able to deliver where there is no external incentive and this is where the package approach is going to have to be very explicitly explained to the farmers who will be expected to take it up.

73. If it is going to work in the next four years then it has to deliver; it cannot wait for these other schemes to come on board. You have expressed some doubts about some aspects of the Crop Protection Management schemes but are you broadly happy that there are sufficient incentives within the present Voluntary Initiative to achieve that?

(*Dr Leinster*) One of the areas of potential concern that we have with the scheme is the level of uptake and I think now, as was explained, the Voluntary Initiative has been in an initial forming process and a setting up process. Now what we are interested in is what will the level of uptake be and I am not sure that there are good systems in place yet which will guarantee that there will be a high level of involvement within the Voluntary Initiative. So we are looking to the industry, to the farmers, to see how they are going to incentivise. I think one of the key things about the Crop Protection Management Plans is that they need to be targeted, accessible and applicable to all farmers, not just trying to improve the best 5 per cent. So we need well-designed, relatively simple and appropriate Management Plans but whether they are taken up is the question.

(*Dr Armstrong-Brown*) Can I come in there? There was a point which was made in the earlier session about the degree of involvement in the Crop Protection Management Plans and I think the phrase used was a thesis versus sensible plans. I think the point here is not really that, the point is that they must be effective. They must deliver change in the ground and they must protect the environment and they need to be as complicated as necessary to deliver a realistic level of change across the farming environment. That is really what we are aiming for and of course the challenge is then to make it as simple and accessible as Paul as described in order to ensure wide uptake. There is no point in having 100 per cent uptake of something which delivers no change.

Chairman: Yes. There is a bit of a problem there, is there not?

**Sue Doughty**

74. Can I just raise a quick point here because I was interested in what you were saying about it not being just the top 5 per cent who were motivated. As we all know there are the people at the bottom of the heap, the worst of the bunch, who need the most work doing with them and who are the least motivated and the ones who can cause the most damage. Do you feel that there are special things you need to do with such people? Do you feel that the plans we have in place will not only talk to the well-motivated but will talk to the totally de-motivated and switched off group of people who perhaps are not quite so ready to change?

(*Dr Armstrong-Brown*) I do not think they will, frankly. I think there is going to be a big challenge there with people who feel overburdened with different incentives and different initiatives coming at them from all directions, pressure from environmental groups, pressure from health and welfare groups. I do not think those people are ready to engage with this process—we keep coming back to incentives—and this is where a good incentivisation package and a good effective communication package will have to play a part. There is another role there. If people really are in breach of good practice you start coming up against legal questions of practice. The VI is really targeted at routine legitimate use and the improvements which can be made with it to avoid the environmental impact of that use. If people are dropping out of the bottom of routine legitimate use and getting into very poor practice which is causing things which ultimately are legal problems there are other routes to address those particular actions which the Environment Agency can comment on more.

(*Dr Leinster*) Yes. I think also in this situation it is for the industry to deliver the farmers into the scheme because we are talking about a voluntary initiative, a voluntary initiative so that we do not have regulatory and fiscal measures. Therefore, I think the questions about participation within the scheme should really be directed at the industry to see what their mechanisms are going to be to ensure this high level of uptake. As Sue says, if it comes to illegal practice then we still are able to use our enforcement and prosecution tools and we will continue to do that.

**Mr Jones**

75. We have heard in the previous presentation the clear view expressed that we should stop talking about a specified tax, let us get on with the voluntary scheme, let us have the full five years and then we make decisions. Do you think you will be in a position to take a view in four years time and what will be the basis upon which you take a view upon this scheme?

(*Dr Armstrong-Brown*) I think that really we are going to be taking a continuous view on it. We are not going to wait for five years to decide whether or not the RSPB feels that the biodiversity objectives of the scheme have been successfully achieved. This will be something which is constantly kept under review.

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[Continued

**[Mr Jones Cont]**

It will be something which the RSPB remains extremely interested in throughout the progress and if before the five years are up there are significant concerns we would not want to wait for the whole five years before those concerns are addressed.

(*Dr Breach*) Could I perhaps add for Water, and as we have described in the evidence, that in at least three of the catchments which are surface catchments you get a very rapid response to the use of pesticides, within days, and the process we envisage (which has been agreed with the local groups) is that even as we speak, spraying is starting or about to start and we will be monitoring that and feeding back the results at the end of that spraying season (i.e. by Christmas) to see whether what has gone out so far has had an impact. I would imagine in at least some of these catchments you will see very quickly whether or not it is working. We envisage a cycle of improvements in each catchment, each spraying season. So certainly within the next twelve to eighteen months we will get some early signs as to whether or not it is working but it will be very dependent upon the weather conditions. If the weather is favourable you are less likely to get a problem but you will get some very rapid feedback and that will give us some confidence about whether generally the measures are working or not.

76. Who will you be giving that data and that assessment to?

(*Dr Breach*) Whoever wants it—

77. Well, we will want it, I should imagine.

(*Dr Breach*)—and of course the Steering Committee, but what we have particularly done is a lot of work with the agronomists. They are seen as key people, they are the advisers in local catchments and we have had local meetings with them. They are giving advice as we speak to the farmers in their particular pilot catchments. We will give the results of the monitoring back to those farmers and the agronomists to say, “This is what we have found. Can you marry up what you believe was done differently against the results we are finding.” Of course we will make that much more widely available. It is only a very limited thing at this stage but it is very focussed and it will give us the ability to test these issues of incentivisation, uptake and whether you can actually realistically get across good practice to every user. One of the things which surprised us in one of the catchments which is quite small was that we had 500, (when we finally got it) on the list of people who potentially use pesticides. We have to mail each of those, get each of those potential users to understand the problems and do the right things. That is a big challenge.

(*Dr Leinster*) I think one of the key things here as well is having clear agreed targets and indicators which we can monitor against and in the absence of having targets and indicators which are going to demonstrate progress in the near term now I think we need other success criteria milestones which demonstrate that this initiative is moving forward. I think by having those, by transparent reporting against those, then we can all see—

78. Can you give us some examples of the sort of milestones that you want to see?

(*Dr Leinster*) The sort of things I would like to see are a number of people who are signed up. So to begin with, before we start getting environmental outcome indicators we most probably will have process indicators, which are about the number of people who are signed up to the scheme. I would also like to see an indicator around pesticide usage which is to do with quantities used as well.

79. There is likely to be some degree of confusion as a result of the Voluntary Initiative having their process targets, organisations like your own seeking different measures, and certainly one group of people will be saying “They are our successes.” Can you not come up with some clear targets or indicators, a small number, which you would say are the key issues? The water industry has clearly given us an example.

(*Dr Leinster*) Just to clarify, what I am talking about is that the Voluntary Initiative should have these targets and objectives so that it is agreed within the Voluntary Initiative, which includes ourselves on the Steering Group, that these are the indicators which are going to be used to measure the success of the process. So these are not a separate group which the Agency would have, or English Nature or RSPB, these are the Voluntary Initiative targets.

**Mr Thomas**

80. Are those separate targets to the ones which have been agreed with Government or are you talking about just using the targets and aims that you already have submitted to us, as it were?

(*Dr Leinster*) Yes, they are in development.

(*Dr Burn*) Can I fill in a little bit on that. There has been quite a bit of work on targets and indicators in the hiatus between submitting memoranda and this meeting. Quite a lot of that has been done fairly speedily and I think the material which has been sent to Government includes a number of caveats about what needs to be done over and above what has already been submitted. We feel very strongly that those caveats are an important part of that document; in other words there are still significant areas of target and indicator development which must be worked on and agreed by the Steering Group. They include things like pesticide usage criteria, they include things like interim targets that will tell us something about uptake over the next year as we move from development phase into uptake phase and they include particularly more work on environmental indicators, which tell us a bit more about precisely what impact pesticides are having. We are all very well aware that the environmental indicators we have got are reasonably loosely associated with pesticide use but they are the best we have because we have got good baseline data. I think the group which has been working in this area is attempting to develop an improved environmental indicator and that is what we need rather speedily.

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[Continued

**Mr Jones**

81. Is that what you meant in your memorandum when you said, “The way in which this issue”—the development of indicators—“has been explored through the Pesticides Forum has presented some difficulties for the government departments involved”<sup>2</sup>?

(*Dr Burn*) No, that is more a specific thing. Well, it is related to that. It is the fact that in order to make best use of expertise the Steering Group decided to use the Pesticides Forum, which is a Government established body, to help its thinking on setting targets and indicators. The difficulty has been the role of Government in both being part of that forum but not being part of the Voluntary Initiative. So what role does it take, say as secretariat of the Pesticides Forum steering group, when we are discussing and attempting to agree indicators which will then be taken forward by the Voluntary Initiative? Similarly, what priority do we give within that steering group to priorities set by the Voluntary Initiative as opposed to, say, the Pesticides Forum? So that is the sort of difficulty which is facing them.

Mr Owen Jones: Thank you.

**Mrs Clark**

82. We have been talking about monitoring and of course we are the Environmental Audit Select Committee, but the impression I got from your memoranda is that basically we cannot afford to wait until the end of the VI procedure before actually monitoring its success. How long should we let it run before perhaps pulling the plug on it altogether?

(*Dr Armstrong-Brown*) That is an extremely difficult question to answer because apart from the decision of whether or not it is working and the timing of that decision there are then the implications of the decision which you make as a result of the monitoring. So to deal with the first one first, it has been quite difficult this year to assess progress because of the infrastructure which has had to develop around the project. So there have been delays, which I think has been discussed already. As of next year there should be things on farms happening on the ground which are more measurable and more closely related to the eventual objectives of the VI and it will be a lot clearer by this time next year, I think, the degree to which it is going to be effective. But even then in the worst possible case scenario, which I sincerely hope will not happen, if nothing is happening in the ground at all this time next year, if the decision was made to pull the plug (as you put it) that has an awful lot of implications for goodwill. There is an enormous amount of activity going on in the industry to make the VI work and if it was ended and if Government withdrew any kind of interest from it then all the goodwill and all the investment so far would be sacrificed and that would probably not be in the best interests of the environment at all because many of these activities would need to continue in some guise, whatever the overall solution was. So I think that really any future for the VI needs to be based around some concept of evolution of the current package.

83. In other words, there is no way that we could abandon it anyway? It would be a sort of albatross whether it was working or not?

(*Dr Armstrong-Brown*) You could abandon it but it would mean starting again from scratch.

84. Talking about monitoring, auditing and reviewing, who is going to do that? Who do you recommend, or what body?

(*Dr Burn*) Part of the role of the incentivisation group has been to look at how monitoring of uptake can be assessed and at the moment, as I understand it, Farm Assurance Schemes are likely to play some sort of a role in that. But I think our view is that there is still quite a lot of room for investigation, if you like, for the role of the Crop Protection industry itself in this, for the role particularly of distributors and advisers on farms who will be supplying products, providing advice, who themselves will be going through training programmes in relation to the Voluntary Initiative and we feel that that area of potential monitoring of uptake and monitoring what is happening on farms has not been fully explored yet.

85. We have a role as the Environmental Audit Select Committee.

(*Dr Burn*) In terms of the scheme as a whole, yes.

(*Dr Breach*) I think most of the measures which are now taking place—and there is a huge commitment to make them work—are all very laudable things which I think nobody would want to see stopped and it would be a terrible shame if that momentum was now lost. But it does have to show that it is actually having an effect. I was listening to the Permanent Secretary this morning talking about the Government’s sustainability indicators and the target is that they are all moving in the right direction. It does not mean they have got where they want to be but if they are moving in the right direction then you have got some confidence that they are beginning to have an effect. If they do not move then something is not working.

Chairman: We need to move on, Mrs Clark, if you do not mind.

Mrs Clark: Of course.

Chairman: Mr Wright, the final question.

**David Wright**

86. Dr Burn from English Nature, I was intrigued by your suggestion in your memorandum that a tax could be introduced alongside the VI to encourage compliance. Is that really practical given the number of farmers involved and how would you see that working? In closing could I say, is there anything else the Government ought to be doing to push this whole issue forward?

(*Dr Burn*) As to whether it is practical, I think there are examples of the same sort of approach but on a completely different scale in relation to say, for example, the climate change levy and the way in which that relies on an agreed approach which then has, if you like, a rebate associated with it. So there is a precedent, if you like, for this kind of approach but I think we have to admit it would be hugely more complex and administratively bureaucratic to do it at the individual farm level. But I think it is something

<sup>2</sup> See written memorandum from English Nature, para. 9.

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[Continued

**[David Wright Cont]**

to bear in mind, particularly if we are agreed that the Voluntary Initiative is doing valuable things but incentivisation is proceeding too slowly. I think the banded system where people who were not complying effectively were banded through a series of tax levels depending upon how poorly they performed—you could invent all sorts of potential ways of doing it but I think the administration of it becomes complex. But I think it is worth having it there as a potential if, as I say, incentivisation proves difficult. If I could come to your other point about the broader role Government could play, I think there is a difficulty in that the Voluntary Initiative is attempting to do something quite innovative and quite striking in the absence of any kind of real structure as to where we want to go with pesticides as a whole. The Government has its own minimisation policy, its risk reduction programme delivered through the Pesticides Forum, but there is no real action plan associated with that and it does not fully

take into account other activities which are affecting pesticides, like the EU review programme, which we heard about earlier, which will make a massive difference to what is available for farmers to use, and like the drive for increased uptake of organic farming. All those components, if you like, need to be brought together as part of an overall strategy and I would say just before closing that I think the role of enforcement and particularly of surveillance of compliance with existing legislation is a particularly weak point in our own approach at the moment.

Chairman: I think we agree with you there, Dr Burn. Thank you all very much indeed. I am afraid we have to bring the session to a close but it has been very helpful from our point of view and I hope you have found it too. Incidentally, I do not think the Committee has ever had four doctors in a row. I am most impressed by this. Thank you very much.

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### Memorandum from Professor J B Dent, Chairman of the Voluntary Initiative Steering Group

#### “Minimising the Environmental Impacts of Crop Protection Chemicals”

##### 1. OVERVIEW

In August 2001 the Minister for the Environment, Michael Meacher MP, asked me to be the independent chairman on the Voluntary Initiative Steering Group. My role was to ensure that the Initiative delivered the agreed programme of projects to bring about a reduction of environmental impacts associated with pesticides. Further, I am charged with ensuring appropriate audit: technical, financial and environmental.

The Minister expects me to submit a report in advance of the pre-budget statement (September) and in advance of the budget itself (January). This year I have also met with the Minister on two occasions. Additionally, I have been asked to ensure that the overall process is transparent by asking the signatories to create a web-site ([www.voluntaryinitiative.org.uk](http://www.voluntaryinitiative.org.uk)) and by producing a publicly available annual report from the Steering Group (completed in July 2002).

Progress during the first year of the Voluntary Initiative was adequate although some of the delays that were encountered resulted from the need to create infrastructure for the work. This has now been established and progress is beginning to accelerate.

The Steering Group has met four times in the first year and so far has met on three occasions in the second. The strategy of the Steering Group is to ensure that the technical programme of research, training and information transfer takes place effectively and according to the milestones agreed with the Minister. There continues to be good support, enthusiasm and active participation from all stakeholders, the environmental organisations and the official observers represented on the Group.

Substantial progress has been made on two of the three pillars on which the 27 projects have been built.

- (i) The key survey of current application practice was published in March and the results have been used to develop further at least two of the individual projects.
- (ii) The Biodiversity network promised by the Crop Protection Association has been established and although the appointment of the biodiversity officer was delayed, this element is making up for lost time.

However, I continue to have concerns over the third pillar; development of the Crop Protection Management Plans (CPMPs). Although a plan was given to the Steering Group on 4 September, the work remains behind schedule. All but seven of the individual projects are now on schedule. For these seven, I have asked the signatory organisations to take action on any problems as they have arisen and I am certain that the present situation will be corrected in the next few months.

##### 2. INDICATORS AND TARGETS

In the letter confirming my appointment of 8 August 2001, I was given responsibility, amongst other things:

- To ensure that the “package” (measures agreed between the signatories and Mr Meacher) was implemented in a sensible, timely and proper manner.

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- To monitor the progress of the implementation against milestones and overall financial commitment, as set out in the package.

During the year or so of my involvement, I have felt more emphasis from the Minister on the wider issues of finding ways to monitor the impact of the VI on the environment which was not specifically part of my brief.

Clearly, the national impacts of the VI must be monitored, but requesting the Steering Group to propose indicators and targets and to monitor these extends the range of activities from those agreed. This we can probably manage. There remains the philosophical point about the VI being asked to audit its own activities.

I have proposed that the VI be guided by the Pesticide Forum Outcomes and Indicators sub-committee on the detail concerning the appropriate indicators and targets and to assist with interpretation. This suggestion was welcomed by the Pesticide Forum but there now appears to be some worrying concerns because of the work loads of the PSD Secretariat as well as key individuals.

I know the Minister is somewhat disappointed about the slowness of the Steering Group in reaching conclusions on indicators and targets and wishes (as do we all) to see measurable reductions in those indicators selected. He has stressed to me his wish to see such reductions “in the short term”. I have, in our meetings, said in response:

- That the VI agreement is for five years and that some indicators will not change quickly no matter what action is taken because they are part of an ecological chain.
- That many other factors influence indicators (such as the weather sequence and changes in general farming practice) as well as VI activity. Nevertheless we hope to see some early, positive impact of VI pesticide stewardship activities on water quality within several test catchments in which we are working.

### 3. THE VI IN ISOLATION

In correspondence, the Minister has stressed to me that he wants the VI to provide reduction in pesticide impacts “in its own right”. There are two issues I wish to highlight:

- disentangling the effects of VI activity from other influences is not easy; and
- would prefer the VI not to be isolated in this way. I can see the wish to test the VI for efficacy. But simply testing the VI is not really the issue. The Steering Group wishes to achieve environmental gain as soon as possible. The VI does not have a mandate beyond the agreement and there are many complementary activities that would assist in reaching this goal.

One such example which would have a great and speedy beneficial effect on water quality and biodiversity would be a decision to implement 6 metre conservation headlands within set-aside. If this was approved by Government, the VI could then promulgate the advantages within its training, CPMP and information programming—a win, win situation for all.

### 4. MINISTERIAL SUPPORT

The attitude of Ministers to the VI is extremely important in relation to farmers embracing the programme. In the Steering Group paper on “incentivisation” sent to the Minister in mid-September, a plea was made for Government to take a positive attitude to the VI on a number of accounts. Two are worth highlighting here:

- The Steering Group and most farmers are aware of the potential application of a pesticide tax if the VI is not effective. Some farmers hear this message too often and feel that a tax will happen whatever they do and therefore will not feel it is worth their while to become involved in VI activities. Ministerial “talking-up” of the VI would itself provide farmers with powerful encouragement.
- The Steering Group is convinced that Assurance Schemes can play a key role in encouraging farmers to be involved in VI activities—particularly in training programmes, in equipment testing and in adopting best practice. It would be valuable to have detailed debate with Ministers (we have touched on the topic at previous meetings) to explore the prospect of encouraging the incorporation of VI activities within the existing responsibilities of Scheme membership.

### 5. RESOURCES

I believe that the VI activities have so far not been restricted by resource provision. The first year spend was less than the anticipated average over the five year period—but this was anticipated as the programme framework was built-up. The substantial financial support for the VI will come from farmers and growers as they are drawn into the work. This is why positive encouragement towards farmers is so important.

All the Farmers Unions are strongly supportive and the fact that in Scotland and N Ireland (and probably soon in Wales) separate VI implementation groups have been established is extremely encouraging.

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### Examination of Witness

PROFESSOR BARRY DENT, Chairman, Voluntary Initiative Steering Group, examined.

#### Chairman

87. Welcome, Professor. I think you have probably had some benefit from listening to what has gone on before but we are very grateful to you for coming along by yourself, as it were, to talk to the Committee. Mr Owen Jones, I think you want to lead.

#### Mr Jones

88. Yes. Welcome. How do you see your role as chairing this Voluntary Initiative?

(*Professor Dent*) Well, I was given a brief by the Minister initially about a year ago and that really directed me solely to the work of the Steering Group and the package of measures which were the signatory arrangement. So my role was to ensure that the package was implemented effectively, timely, in a proper manner and also to monitor the progress of implementation; a few other things as well but essentially they were all supporting those two major functions. I think that within that broad statement the Steering Group has got an advisory and support of a technical nature role, which advises the implementation groups associated with each project, and also an audit role. The audit role relates to the technical progress, (the achievement of milestones associated with each project), a resources audit to ensure that projects are not held up because of lack of resources, of lack of immediate resources coming forward. I have to say more recently and coming into greater prominence are some of the things we have been talking about during the course of the afternoon; an environmental audit, which relates to the more global indicators—water quality and biodiversity indicators—which really were not part of the initial brief which I received from the Minister. The brief did not talk about those issues; it talked about implementation of the package and, the projects which were associated with that package. So I think that the Steering Group has taken on that additional role and I must say I feel to some extent a little edgy about this audit role in the global position which we can perhaps talk about. But I see those as the functions of the Steering Group—technical, advisory, guidance and support for those carrying out the various projects and implementing the projects, and particularly the project leaders, and auditing the process of each and every one of the projects and ensuring that the resources are not limiting. I think I would like you to grasp—I am sure you have during the course of the afternoon—the enormity of this programme. It is a very large, complex, multi-projected initiative. I do not think we have taken on anything so broad and complex and interacting as this before. It is a reasonably large sum of money or large amount of resource going into the project each year so it is really crucially important that we monitor it for resources and for technical process.

89. When you say it is a large and complex undertaking I think you have got the sympathy of the Committee here. When we took evidence from the

then Finance Minister three years ago about a pesticides tax the industry persuaded the Prime Minister in a very short period of time that this was something they wanted to do and they were able to do it.

(*Professor Dent*) I think, if I may, it is worthwhile saying that we are catching up on the process of this whole Initiative almost week by week now. Most of the milestones for each of the projects are being met and in fact surpassed in some areas and some of the projects have already completed and reported, in fact an increasing number are now reaching that stage. Those that are behind schedule are closing in quickly except for the one which you have already explored in relation to Crop Protection Management Plans, but I think the issues my colleagues have raised in relation to that particular project are real and I sympathise with them.

90. How much support has the Government given you in your work and to what extent is the Government a partner in this?

(*Professor Dent*) Well, not at all really. I must confess to a certain amount of confusion about this because when I was invited to chair this I understood this was to be a kind of partnership—you used the word—that it would be something where we could work not only with the signatories and with the Environmental Agency and the farming groups but also there would be input from DEFRA in particular into the process. I think that that has not happened. The Minister has been open and has indicated to me on all occasions that all I need to do is to knock on his door for a discussion. I would hesitate to do that but we have met several times. But as far as DEFRA is concerned we have not really had very much in the way of support and I think it is disappointing.

91. So they said, “All right, get on with it”?

(*Professor Dent*) Yes.

92. “Come back to us in five years time and we will tell you whether we are happy or not”?

(*Professor Dent*) Yes, and I think it is a very perceptive point you have put your finger on here because what I am concerned about is that within DEFRA—I do not know how to say this, I will say DEFRA but it may not be just DEFRA—I think there is an issue that we are here testing whether the Voluntary Initiative will work, whether a voluntary process will function. What we want to do is to ensure that through the Voluntary Initiative and other measures that are going on and the interlocking of those various issues we bring about environmental benefit to rural areas. It is quite an interesting point whether in fact we are simply being put out there to be tested to see whether this will function. I think it is very disappointing if that is the case and it is manifested in a number of ways. One of the issues which is troubling me at this point in time is the fact that we have kind of moved through sections of DEFRA and are now sort of reporting to PSD in York. That feels to me to be putting me further away from people who are close to the Minister. It is manifested in an issue which, quite frankly, I was very annoyed about and that is DEFRA letting a

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PROFESSOR BARRY DENT

[Continued

**[Mr Jones Cont]**

research project assess the Voluntary Initiative without any discussion with me at all or with any of my colleagues. I found out about this because colleagues mentioned it to me, not colleagues from the Voluntary Initiative but academic colleagues. So I just feel we are a bit at arm's length so far as DEFRA is concerned.

**Mrs Clark**

93. Could I come in very, very quickly on this. I was going to raise it later but whilst we are on the topic, it is often assumed, and I know that yourself as the chairman you have been given by DEFRA a large and in fact ample time allocation to steer the Voluntary Initiative but as far as I know no one has actually asked you for your views on this and I have heard that DEFRA only pay you for eight days a year to look after the Voluntary Initiative. Is that true?

(*Professor Dent*) Yes, about half a day a month.

94. That is outrageous.

(*Professor Dent*) Thank you! I suspect my time input is probably up to seven, eight or even ten times that at certain times of the year.<sup>3</sup>

**Mr Jones**

95. To put the contrary view to my colleagues, simply to let it be heard, since this initiative comes from the industry should the industry not pay you?

(*Professor Dent*) Now this is an issue which came up with a very senior member within DEFRA and my response was that I am not having any money from the industry. I am supposed to be an independent chairman and if I was associated with the industry in any way I think that would greatly weaken my position and lose the balance within the Committee. So I do not think it is an industry issue either to pay my expenses or to suggest that I should be doing more days in the job.

Mr Owen Jones: Thank you.

**Sue Doughty**

96. Having looked at a number of the projects you are undertaking and the fact that they were late but now we have got into a very good period of catch-up, which is good news, obviously there is always a lot of investment at the early stages of this sort of activity. It strikes me though—this is because I am a professional project manager historically—that we are looking at it as a project rather than an initiative, in other words you have got a series of activities to meet deliverables, and what you are describing is a whole list of tasks to undertake and yet the Government is treating it like an initiative: “We will set one of these up and we will leave you to worry about it and we will have a little look at you, see how you are getting on and pat you on the head or abandon it if it is not working.” So this does worry me. Am I getting the right idea from what you are saying? Am I drawing a correct conclusion that it is

very much something where a little bit of investment at the right time would yield very good benefits in terms of helping this project go forward?

(*Professor Dent*) I take the point you are making. The Initiative was established on an industry pay basis. I have no quarrel with that. I am not looking for DEFRA money for the Initiative at all. It has to be funded by the signatories, that is the way it was set up, but I think the sense of isolation and the lack of debate and discussion about issues which impinge on, interact with, create synergies with the Voluntary Initiative would be extremely welcome and I think both DEFRA and the Ministers could play a role in that and it would be a relatively easy thing to do. But I do feel from my perspective—I do not know how my colleagues feel—a sort of sense of isolation from other things which are going on in DEFRA and we have not been able to create a kind of forum whereby these things can be debated.

**Mr Thomas**

97. I can see several recommendations perhaps from this Committee regarding incentives, some of which may help you.

(*Professor Dent*) Thank you.

98. With regard to the incentives within the Voluntary Initiative itself, we heard some concerns earlier on that perhaps the whole Initiative was insufficiently incentivised on incentives for the farmer, for the individual crop grower anyway. Do you share those concerns yourself?

(*Professor Dent*) Well, it was in fact one of the points which the Minister asked me to take and to resolve outstanding concerns over the incentivisation package, the delivering mechanisms and the various monitorings and targets. So incentivisation has always been at the front of the Minister's mind. I think the incentivisation concept is a difficult one. Because it is voluntary it cannot be statutory, obviously, so incentivising a voluntary programme is quite a delicate matter and my colleagues, I think, have found it to be something they have got to tread warily on and it took a while to develop the paper and the package which is now with the Minister. So I think it was a slowly developing framework but it has now come to fruition. My colleagues have already said to you that food assurance schemes may well play a really potent part in this whole issue of incentivisation and we can see how important they may be. So I think there is now a number of incentivisation issues which are in front of the Minister for his perusal and comment and we are looking forward to receiving this soon.

99. If at the time you produce your second annual report you have not seen a sufficient take-up or you have not seen sufficient evidence of the incentivisation working, what way do you have to make your concerns known to either Ministers or indeed the wider stakeholders within this? Is it a question of just flagging them up in a report or do you have a more direct avenue to take these issues?

(*Professor Dent*) I have a direct avenue to the Minister at any time, as I have mentioned before, and I could certainly do that but I think that we are also in a position where we would want to encourage

<sup>3</sup> Please also see supplementary memorandum from Professor Dent.

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PROFESSOR BARRY DENT

[Continued

**[Mr Thomas Cont]**

farmers—it is a question of encouragement, it is a question of incentivisation—and therefore the whole band of communication or whole set of media issues has got to be brought in. It has already been mentioned and we expressed some lighthearted banter about it but this question of a name was terribly important. It delayed us too long. It kept us too far back from allowing the whole thing to get out to the media and from taking a proactive run at letting farmers really know that this was going ahead at a time when we were trying to make progress. That question of a name was important. It had to be right, obviously the Minister had to be happy with it, but it did delay us quite importantly and I think that kind of bad press is not good for an opportunity like this.

100. If we look at your first annual report there are some targets and figures in here but they all relate to the processes—establishing the processes, establishing the meetings and the implementation groups, and so forth.

(*Professor Dent*) Yes.

101. But they are not actually relating to the environmental impacts. It is still early days, I accept that, however in the last year or so have you had any thoughts about the actual aim of the Voluntary Initiative itself because it is, as it says, to minimise the environmental impact of pesticides? We have already heard a little about some of the conflict which may be there between some pesticides which environmentally may not have a huge impact but in the drinking water, for example, have a very big positive impact. Are you still happy both with the baseline that you now have in order to measure process and secondly with the aim of the Voluntary Initiative itself?

(*Professor Dent*) I am happy with the monitoring process which is going on in relation to the process and I think that is becoming simpler as we are actually drawing projects to a close. So we are getting a tighter control of the remaining and often the longer and bigger projects. So I am happy with that. In terms of the more global impacts the Minister has frequently mentioned to me that the issue he is concerned about is the amount of pesticide. I find that to be a confusing term. I do not actually know what it means and we have already talked about that. He has also talked about the importance of biodiversity and he has talked about the importance of water. Obviously these are important things. The issue is, should the Voluntary Initiative be devising targets, indicators, to monitor its own operations? It is kind of like an internal audit really. So in order to counter that situation I talked to the Pesticides Forum (and several members of the Voluntary Initiative are on the indicators sub-committee of the Pesticides Forum). They are the organisation who have the real expertise to develop indicators and I think we should be guided by them to take on indicators which they feel are going to be relevant. Of course we have had our feedback because our members, as I say, are part of the Pesticides Forum but we have had no real debate between the Pesticides Forum and the Voluntary Initiative apart from this membership inclusion. Indeed, I am now concerned that the Pesticides Forum, operating through the Pesticides Safety Director (PSD), are now saying they do not have enough resources in

order to provide a secretariat for a linkage between the two operations and that worries me as well. But this internal audit issue is something that I feel sensitive about and I would prefer a situation where we were given clear guidance about indicators and that we took those on and met them and that somebody else also measured the impact from baselines that we know about.

102. Have you had any sense that Government Ministers or Government Departments have been changing their strategy on pesticides since the establishment of the Voluntary Initiative? Have they become a bit more hardline, for example, on whatever “quantity” might mean?

(*Professor Dent*) No, I have not picked that up at all and I think the Minister is quite flexible about how we define “quantity” but I think he would like to see some change in the way the current situation is measured.

103. Who would you like to see audit this internal audit you were talking about? Who would you like to see perform that task ideally?

(*Professor Dent*) I think that the Pesticides Forum is the medium whereby some of these issues could be brought forward. As it happens the current set of indicators which relate to certain bird species (which are ‘guide indicators’ only because of course they do not apply to all the country) and the water indicators are probably all right and we can probably manage with them but the Pesticides Forum is also developing new concepts about indicators and we need to consider how we relate to them and what should we be doing in relation to them. I feel that that debate is important and that we should have it.

104. So there could be some confusion about pesticide indicators? You are concerned about that?

(*Professor Dent*) I am concerned particularly that we do not audit our own work.

105. Can I just finally ask you about the financial resources which may be available to you, whether it is in auditing or in incentivising, and so forth. You mentioned earlier about the opposition, of course, as an independent chair but also the industry—both sides of the industry, if you like—financing the actual operation of the Voluntary Initiative. Are you both happy that there are sufficient resources there and secondly that it will be sufficiently transparent for people like ourselves to know exactly what the industry has put into this, whether it be in staff time or in actual financial contributions?

(*Professor Dent*) I can see your concern. I do not believe that any part of the Initiative; any of the projects within the Initiative, have suffered greatly from lack of resources during the year that I have been associated with it. It is possible that some timing of resources may have been a bit slow in coming forward but my view is that there has been no hold up of the process from resource constraints. As has been said earlier in the afternoon, we are in a situation now where these processes have been thought through, they have been put in place, the framework is all there and it is going out to the farmers and to the businesses and it is their take-up and their involvement, their payment for courses,

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PROFESSOR BARRY DENT

[Continued

**[Mr Thomas Cont]**

their payment for registration and so on which is going to be the big input into the Voluntary Initiative in the future.

106. That individual payment by farmers counts in your whole figure, does it not?

*(Professor Dent)* Yes. I understand that that is part of the total package. When you look at the DEFRA publication and their view about how much the total package of measures would cost they costed all that into their investment, yes.

107. And transparency?

*(Professor Dent)* I think we could be better at transparency and in fact I have already had discussions with the CPA on this matter.

**Mrs Clark**

108. We have talked about monitoring and auditing quite a lot this afternoon and certainly my understanding from the environmental organisations is that they think we really cannot wait until the end of the Voluntary Initiative before actually judging whether it has been a good idea, whether it has been successful. Would you agree with that?

*(Professor Dent)* I certainly think we need to see progress from now onwards, continuous progress, and I think Dr Breach mentioned that he would be looking for a continual improvement in water quality as we go through the process. One of the things we have not done in the indicator paper which had gone to the Minister is to provide intermediate targets. We have provided end point targets for the 2005–06 sort of time. We are now going to set about providing intermediate points for us to latch on to.

109. What about those who actually decide not to join the Voluntary Initiative? English Nature has got its HQ in my constituency and they have suggested that it could even be possible to introduce a sort of adjoining tax alongside the Voluntary Initiative for those who do not join it. Would you agree with that? Is that even possible?

*(Professor Dent)* I do not quite understand the logic of that arrangement. I am not sure what it would achieve. Effectively the whole issue is to bring about a reduction in environmental impacts. If you are going to tax to bring about some change, the money is coming away from the farm. The farmer is then not going to have so much money to get involved in the Voluntary Initiative operations. I find that to be something I just cannot get my mind around how you would do that.

110. I will get back to you on that one then.

*(Professor Dent)* Yes.

Mrs Clark: Thank you.

**David Wright**

111. In the last budget the Treasury indicated they may well look at tax measures in relation to fertilizers. How do you think that would sit with the VI scheme? What would be the impact if the Treasury decided to proceed with a tax regime relating to fertilizers?

*(Professor Dent)* I think we have heard during the course of the afternoon my colleagues saying that the constant talking up of the threat of a tax is probably having a deleterious and perhaps even perverse effect upon the Voluntary Initiative and I think that if a fertilizer tax were applied it would just underline that position and I think it would very much make our job more difficult. So I would hope that that actually does not happen. I do not think it would be to the benefit of and I do not think it would support in any way the huge amount of work we have already done for the Voluntary Initiative.

112. We have also had some discussion about broad and shallow agri-environment schemes this afternoon. Could you just reflect very briefly, to close, how you feel that interrelates with the work you are doing?

*(Professor Dent)* Yes. These are the sorts of debates that I would like to engage in with DEFRA staff to see how there would be real opportunity for synergy. What you have to understand is that the Voluntary Initiative will have a lot of process on the ground over the next few years. It is a fantastic medium for transmitting information, for providing advice, for educating people in understanding and it seems to me that if there were opportunities for debate about things like broad and shallow but other issues as well like conservation headlands, and so on, if there were real opportunities for us to talk about these sorts of things it could well be that DEFRA would find the Voluntary Initiative to be a wonderful tool to push forward its own agenda. What I would really like to see is much more searching for synergy instead of a separation between the Voluntary Initiative and other opportunities that DEFRA have on hand.

**Mr Jones**

113. In answer to my colleague Helen Clark you expressed the view that you did not think that tax could have a role in incentivising. Do you take that as a philosophical view about tax in general, you do not think that tax in any instance can be used in order to disincentivise or incentivise action, or is it just farmers, do you think, that cannot be affected by tax?

*(Professor Dent)* No, I do not think that at all but I do not think that we have any real information about the way the tax would impact on the behaviour of farmers in relation to the application of pesticides. I think there is a good deal of information in a general area where taxation has no impact on behaviour, smoking for example. I do not actually know what the tax is on a packet of cigarettes, I do not smoke, but it is very high.

114. The justification for that tax is that it is meant to affect behaviour.

*(Professor Dent)* What we know affects behaviour is that people get frightened about the possibilities of lung cancer or it does not have any effect at all, particularly on young people. I do not really want to get into this. I am sure you know an awful lot more about that than I do. The issue is that I am not convinced and I think a lot of my colleagues are not convinced either that a tax will modify behaviour. You have heard on numerous occasions during the

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PROFESSOR BARRY DENT

[Continued

[Mr Jones Cont]

afternoon that farmers are not there to spend money on pesticides just for the sake of spending money. They are concerned about being sensible about it. It is a bill after all and it is a big bill at the margin; it affects their gross margins quite considerably. So my view is that I have seen the studies which have been done in terms of the impact of a tax on pesticides and I do not believe much of what is there. I do not believe that anybody has got any concrete evidence about how a tax will change behaviour and I do not think it will change behaviour very much. My philosophical point then is that I believe that understanding of the relationship between the scientific elements and the technical elements of pesticides and the natural environment, training to reinforce that, better, frequent and good information and new research, those are the things which will make an impact because those are lasting things; they impact on people. You heard earlier of quite a few pesticide incidents which are caused by one or two instances of bad practice; isolated instances but they do make a difference. If the operator does not understand that at the end of the day when he has got half a tank of pesticide left and he just ditches it in the lane and off it goes down into the water course that is bad practice and he knows why it is bad practice, he will do that whether or not the farmer pays a tax or not. So my philosophical point and why I am so keen to see this Initiative move forward is that I think we will move environmental indicators more rapidly, more permanently, more reliably if we educate, train and provide information for people and make sure the equipment they are using is of a high standard and properly maintained.

**Mr Barker**

115. One very quick question, to put that into some context. Given the extraordinary collapse in farming income in the last few years and the very real fragility of the whole farming economy do you think there is actually any scope anyway to even begin to think about levying a tax?

(*Professor Dent*) I guess it depends upon how much the tax is, but as I said before the use of pesticides is a fairly big element within the gross margin calculations for farmers; it is not trivial. Farmers are not throwing pesticides away because they cannot afford to at the present point in time. A tax would be an additional burden on top of that. I do not think it would change things because farmers on the whole are anxious to do a good job. They are anxious to produce food of the highest quality and therefore I do not think that taxation is the way that those sorts of people will be moved.

**Chairman**

116. Even though taxation would provide income for some projects, for example?

(*Professor Dent*) Well, if we are hypothecating but I personally, Chairman, have little faith in promises of hypothecation, either short term or long term.

Chairman: I think on that interesting note we will end the discussion. Thank you very much indeed, Professor. That was a very interesting session.

#### Supplementary memorandum from Professor Barry Dent, Chairman VI Steering Group

You asked that I gave more exactly, the terms on which I am paid as Chairman of the Steering Group for the VI. My contract with DEFRA is that I should be paid for four days to chair Steering Group meetings each year and that there should be one extra day in preparation for each meeting. The payment is £188 per day. My actual involvement is substantially more than this: I have already recorded an extra 15 days away from home already completed or committed for the 12 months from March 2002. Each of these days, of course, requires preparation. There is, in addition, quite a lot of reading of draft papers, discussion about individual projects, writing reports and preparing papers.

Expenses for attending the Steering Group meetings are paid by DEFRA and, in a non-minuted meeting with DEFRA staff, it was agreed that travelling expenses for some other meetings related to the work of the VI might be paid. So far this has happened and is appreciated.

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#### APPENDIX

##### Memorandum from Friends of the Earth and PAN UK

We would like to thank the Committee for accepting our submission and to confirm that we are happy for our report and this letter to be published by the Committee. In this letter we would like to make some points of clarification to be considered in conjunction with our submission.

At the oral evidence session on 23 October concern was expressed about the possible abandonment of the measures within the voluntary initiative if they were felt to be insufficient to deliver environmental benefits over and above a pesticides tax. We would like to clarify that our support for a hypothecated tax on pesticide products does not mean that we think that all of the measures contained within the Voluntary Initiative (VI) should simply be abandoned. It has always been the position of Friends of the Earth and PAN UK that a pesticides tax and voluntary measures taken by the pesticides industry and farmers are not mutually exclusive. Indeed a hypothecated tax could be used to fund some measures including the improvement of training

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provision. We welcome several of the measures put forward by the industry, some of which we consider to be long overdue, including provision of environmental information for pesticide products. We wish to see continued commitment from the industry to delivering these measures. However we do not believe that these will be sufficient on their own to deliver the changes in farming practice required for the reasons set out in our report. In some cases we believe that the measures would be better addressed by regulation, for example sprayer testing, and in others we consider that the measures would benefit from being more independent of the pesticides industry including the provision of advice to farmers. The reasons for this are explained in our report.

There was also some discussion on 23 October about whether the Voluntary Initiative (VI) is a partnership between the Government and the pesticides industry. Our understanding is that the Voluntary Initiative is an agreement between the signatories and the Government but that it is the responsibility of the industry to deliver the outcomes. Indeed the Voluntary Initiative was a response by the industry to the threat of a pesticides tax and was put to Government with the claim that the industry could deliver environmental benefits over and above a tax imposed by the Government. On 23 October, although Professor Dent said that he had understood the VI to be a partnership, he later confirmed that it was established on an "industry pay basis". This means that the VI should not rely on publicly funded schemes, such as existing agri-environment schemes or the forthcoming "broad and shallow" scheme, to deliver its objectives. That is not to say that the Government should not be taking action to deliver on its pesticides objectives, nor that there should not be co-ordination with the industry, but it is important that the industry led initiatives should be adding value to these schemes not simply free-loading on them.

Finally there was much discussion about the crucial issue of farmer take-up. This is an issue which we highlighted in our report including our concerns about the costs of the measures to individual farmers. We are concerned that the Committee has only heard the view of the main farming unions on this issue and has not heard the views of other individual farmers. We would like to draw the Committee's attention to the fact that well below half of farmers in England and Wales are members of the NFU.

*November 2002***Annex A****WHY THE VOLUNTARY INITIATIVE WILL NOT DELIVER ON GOVERNMENT OBJECTIVES BY FRIENDS OF THE EARTH AND PAN UK**

This report explains why Friends of the Earth and PAN UK consider that the measures set out in the Voluntary Initiative will fail to deliver on the Government's stated pesticide objectives. In addition it sets out our concerns about the process and our involvement in the Steering Group. The report sets out an alternative way forward which we believe will more effectively meet the Government's objectives. We have also produced a more detailed assessment of the key Voluntary Initiative projects and indicators and targets and a proposal for a Pesticide Reduction Strategy, partly funding by a hypothecated tax. These are available from Friends of the Earth or PAN UK.

The Voluntary Initiative will fail to deliver on the Government's objectives because it:

1. ignores key methods of achieving the Government objective to minimize pesticide use;
2. fails to integrate the related Government objectives to reduce pesticide residues in food and protect operator and bystander safety;
3. lacks any proposals to reduce the use of the most risky pesticides;
4. puts its focus on issues that are the least contentious rather than the most important;
5. has inadequate incentives to produce farmer compliance;
6. relies on subsidies and regulations rather than delivering significant change itself;
7. adds nothing significant to existing policies and initiatives;
8. increases the reliance of farmers on pesticide company agronomists making pesticide minimization less likely;
9. fails to stimulate or encourage innovation in pesticide minimization;
10. uses the results from a single farm study to identify a narrow set of measures to tackle water pollution;
11. adopts a narrow view of biodiversity;
12. and has imprecise indicators and weak targets.

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### 1. IGNORES KEY METHODS OF ACHIEVING THE GOVERNMENT OBJECTIVE TO MINIMIZE PESTICIDE USE

The Government's stated objective is "to limit pesticide use to the minimum necessary for the effective control of pests compatible with the protection of health and the environment"<sup>1</sup>. Reduced reliance on pesticides is also likely to be incorporated as an aim in the forthcoming revision of EU pesticides policy<sup>2</sup>.

Minimising pesticide use can be achieved in several ways: preventative action to minimize pest and disease problems; substitution of pesticides with non-chemical means of control eg use of natural predators; reduced application frequency; improved targeting of pesticides eg spot weeding; and better practice in filling and maintaining equipment. The Voluntary Initiative has focused heavily on the last two approaches and ignored the first three. This is, in our view, a significant failing.

Other countries that have run successful pesticide minimization programmes have embraced all the above methods in order to achieve the central aim. They have also often used pesticide taxes both to provide a financial incentive for farmers to reduce pesticide use in the most appropriate way and to provide funding for measures to support farmers in making these changes. Denmark has successfully reduced the treatment frequency of pesticides (average number of times per year agricultural land is treated with the pesticides sold) to 2.0, ahead of its target date<sup>3</sup>. In Sweden the quantity of active ingredient sold was reduced by 61 per cent between 1991 and 1995 and by 60 per cent between 1996 and 2000<sup>4</sup>.

In contrast the Voluntary Initiative does little beyond being an addition to existing schemes promoting best practice in handling and applying pesticides and this is too weak to deliver on the Government's objective of minimizing pesticide use.

### 2. FAILS TO INTEGRATE THE RELATED GOVERNMENT OBJECTIVES TO REDUCE PESTICIDE RESIDUES IN FOOD AND PROTECT OPERATOR AND BYSTANDER SAFETY

In our view the narrow remit of the Voluntary Initiative is a fundamental problem. It addresses environmental impacts in isolation from health impacts and, although it includes measures related to amenity use of pesticides it does not address use of pesticides on livestock eg as sheep dip.

"Joined-up" Government and the demands of sustainable development require that related objectives are considered in the design of policy. The Government has objectives to minimize residues of pesticides in food and to protect human health<sup>5</sup>. Friends of the Earth and PAN have suggested to the Steering Group that the measures should aim to reduce residues in food and also to consider operator exposure, but these suggestions have been rejected by the Crop Protection Agency.

Policies concerned with the impact of agricultural chemicals have previously demonstrated the dangers of tackling one kind of impact while ignoring another. The replacement of organophosphate products with synthetic pyrethroids for dipping sheep, based on concerns for workers health, resulted in increased environmental impacts. These sort of mistakes should not be repeated, but because the Voluntary Initiative fails to consider the full range of environmental and health impacts it runs the risk of doing so.

### 3. LACKS ANY PROPOSALS TO REDUCE THE USE OF THE MOST RISKY PESTICIDES

A targetted reduction in the use of those active ingredients known to cause most water pollution and those known to be most harmful to wildlife and human health would have a significant effect on reducing the impacts of pesticides. The Voluntary Initiative largely ignores this approach.

The only active ingredient which is the subject of more detailed attention is sulphuric acid, used as a dessicant on potatoes. This is a strange choice since it is not one of the pesticides which causes water pollution or is associated with biodiversity decline. As noted by a consultants report to DEFRA on voluntary measures<sup>6</sup> "there have been no concerns about the direct environmental impact of this product" and "quantification of benefits is not possible". While there are concerns about the effect of sulphuric acid on operator's health this is not addressed by the Voluntary Initiative.

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<sup>1</sup> PSD, HSE, The Registration Handbook, Pesticides, Biocides, Plant Protection Products, A guide to the policies, procedures and data requirements relating to their control within the United Kingdom.

<sup>2</sup> European Commission (2002) Towards a Thematic Strategy on the Sustainable Use of Pesticides, Communication from the Commission to the Council, the European Parliament and the Economic and Social Committee.

<sup>3</sup> PAN-UK (2002) Danish success with Pesticide Action Plans, Pesticides News 57, September 2002.

<sup>4</sup> PAN-UK (2002) Persistence Pays—lower risks from pesticides in Sweden, Pesticides News 54, December 2001.

<sup>5</sup> Food Standards Agency (2002) Developments in the Agency's work on Pesticides and Veterinary Medicines, Paper FSA 02/06/04 June 2002.

<sup>6</sup> Eftec, CSERGE, ENTEC, (2002) The Potential Cost and Effectiveness of Voluntary Measures in Reducing the Environmental Impact of Pesticides, DEFRA February 2002.

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The Sulphuric Acid code is concerned only with best practice in its use and not its substitution with safer alternatives. There are mechanical approaches to potato haulm removal which are common practice on organic farms but instead of recommending such measures the member companies of the CPA are actively promoting their own products to farmers as alternatives to sulphuric acid<sup>7</sup>.

As the remit of the Voluntary Initiative is to focus on water pollution and biodiversity it would be more effective if it targeted those herbicides and fungicides which most frequently cause water pollution incidents and/or are most harmful to flora and fauna. Atrazine and carbendazim, for example, are both pesticides that are listed as common causes of water pollution incidents, are hormone disrupters and can have a detrimental impact on fish and other aquatic life.

#### 4. PUTS ITS FOCUS ON ISSUES THAT ARE THE LEAST CONTENTIOUS RATHER THAN THE MOST IMPORTANT

The Voluntary Initiative has shown that it is only capable of “tinkering around the edges” rather than proposing measures which will make a major contribution towards the Government’s objectives. This is largely because it relies on consensus to have any chance of operating and will therefore avoid important (often deep-seated) and problematic issues in favour of less significant issues where consensus is more achievable. There are a number of examples of this including:

- the Voluntary Initiative focuses on sulphuric acid instead of addressing pesticides that are the most common cause of water pollution and suspected hormone disruptors;
- the Voluntary Initiative proposes to simply send out more information on LERAPS (Local Environment Risk Assessments For Pesticides) when surveys indicate that the system is not working and should be re-examined;
- the Voluntary Initiative has ignored reducing pesticide inputs and instead put a focus on the filling, maintaining and using sprayers.

A report for DEFRA on the voluntary approach<sup>8</sup> notes the limitations of simply issuing advice, information and more training: “*although high quality advice and training can be provided and the relevant parties commit to receive such advice and training, this without subsequent change in behaviour cannot deliver a reduction in the environmental impact of concern*”.

#### 5. HAS INADEQUATE INCENTIVES TO PRODUCE FARMER COMPLIANCE

Unlike staying within the law, paying less tax and benefiting from subsidies, voluntary approaches do not have clear, strong and universally felt motivations for compliance. The main motivation for compliance with the Voluntary Initiative is avoiding the costs of a pesticide tax. Theoretically this would be lessened if it was made clear that the revenue from such a tax would be recycled back to farmers (see final section of this summary). Fear of the tax remains because individual farmers are unsure that it would be recycled in full or in a way from which they would benefit. However, fear of the alternative does not necessarily lead to compliance with the Voluntary Initiative measures.

First, it is farmers who are footing the largest share of the bill for the Voluntary Initiative. So far, the signatory organizations<sup>9</sup> of the Voluntary Initiative have only presented summary figures to the Steering Group which show that a higher proportion of the costs fall on individual farmers. A detailed break down of the cost to farmers of each of the proposals has not been provided.

The signatory organizations have failed to show that the costs of the Voluntary Initiative proposals will be any less of a burden on farmers than a hypothecated tax recycled to the benefit of farmers rather than the agro-chemical companies. Most of the Voluntary Initiative’s proposals involve new direct financial costs to individual farmers, some examples of which are listed below. Many of the proposals also place a burden on farmers in terms of time, such as attending training courses. One of the main pillars of the Voluntary Initiative, the Crop Protection Management Plans, relies heavily on farmers participating in Assurance Schemes. These require the farmer to pay fees to join the schemes and involve time and cost in compliance. The farmer does not receive any guarantee of higher farm gate prices and the environmental benefits of assurance schemes are unproven, in our view they are unlikely to be significant<sup>10</sup>. In the case of the National Pesticide Retrieval Scheme our view is that the pesticide industry should be footing the bill for safe disposal of its products and not passing the cost on to farmers.

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<sup>7</sup> The Gower (2002) Syngenta makes a case for diquat versus acid, *The Grower*, August 22, 2002.

<sup>8</sup> Eftec, CSERGE, ENTEC. (2002) *The Potential Cost and Effectiveness of Voluntary Measures in Reducing the Environmental Impact of Pesticides*, DEFRA February 2002.

<sup>9</sup> Crop Protection Association, National Farmers Union, National Farmers Union of Scotland, country Land and Business Association, The National Association of Agricultural Contractors, the Agricultural Engineers Association, UK Agricultural Supply Trade Association.

<sup>10</sup> Friends of the Earth (2001) *Greening the Red Tractor*10 Voluntary Initiative Incentivisation Sub-Group (2002) *Final Report of the Incentivisation Sub-Group*, Paper No. 02/0072, September 2002.

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*Examples of measures incurring direct financial costs to farmers:*

- Sprayer Operator Training (Project 13).
- Sprayer testing (Project 14).
- National Pesticide Retrieval Scheme (Project 22).
- Crop protection management plans (Pillar 2).

Second, partly because of these costs to individual farmers, it is likely that the farmers who take up the measures are those who are already committed to reducing pesticide use and have the knowledge and skills to do so. It will do little to change the practices of those farmers who are not convinced of the benefits of reducing pesticide inputs or those who cannot afford the time or expense of complying with these measures.

Third, if it is hoped that the threat of a tax will produce real change farmers have to see that proposals for a pesticide tax are firmly and permanently on the political agenda. There are only so many times that the Government can use the “if you don’t we will tax you” approach before it loses its potency.

#### 6. RELIES ON SUBSIDIES AND REGULATIONS RATHER THAN DELIVERING SIGNIFICANT CHANGE ITSELF

The lack of adequate motivations for compliance has been recognized by the Voluntary Initiative Steering Group. This has led to it increasingly proposing new regulation by government and the piggy backing of Voluntary Initiative proposals to existing or proposed subsidy schemes.

For example, it has become clear that operator training and equipment testing will need regulation because the voluntary approach simply will not provide sufficient incentive for farmers to meet the costs of taking up these measures. Further regulation will be needed to override the exemption of “grandads” from formal training. A survey of existing practice showed that over a third of arable holdings are sprayed by operators with no formal training who have “grandad” rights simply due to the length of time they have been sprayer operators. At the steering group meeting on 28 May 2002 the CPA conceded that in the case of encouraging cereal field margins (one of the proposed measures to increase biodiversity) “*the greatest effect on these would result from government policy*”.

In the minutes of the steering group meeting on 28 May 2002 it is recorded that “*several members agreed that some form of financial incentivisation from Government is required*”. Already several of the Voluntary Initiative’s proposed measures rely on public subsidies being made available, this includes for training: “*to a degree government can assist via grant aiding training under the NVQ system and parts of the Environmental Stewardship Scheme*”<sup>11</sup> and the Crop Protection Management Plans which will be heavily reliant on the proposed “broad and shallow” agri-environment scheme.

This a central issue. We would agree that a voluntary initiative is not adequate to address the environmental and health impacts of pesticide pollution but what the Government must avoid is allowing the Voluntary Initiative to transform itself into a forum for deciding public policy. There are three reasons for this.

- The initiative inherently excludes one public policy option, a pesticide tax, that could, and we would argue should, be part of any package of measures. HM Treasury has already stated that it believes there are benefits from using a pesticide tax in conjunction with other measures.
- The initiative has set out to divert attention away from preventative action to minimize pest and disease problems, substitution of pesticides with non-chemical means of control, and reduced application frequency. The VI should not be allowed to divert the Government away from these kind of measures which need to be adopted in order to meet its objectives on pesticides.
- The body responsible for the voluntary initiative has, quite rightly, no remit or legal standing to decide public policy.

#### 7. ADDS NOTHING SIGNIFICANT TO EXISTING POLICIES AND INITIATIVES

The Voluntary Initiative largely sticks to the same policy approach that has been used for a decade and a half. Given that the Government is searching for new more effective policies to deal with pesticide pollution<sup>12</sup> it has to be accepted that the Voluntary Initiative’s approach will continue to be inadequate.

Moreover, rather than proposing a step change in the level of awareness raising and information provision the initiative has simply re-issued and to a large extent duplicated existing advice (as shown in the table below). For example, the Voluntary Initiative has produced a leaflet about avoiding pollution of water but this advice is already provided by DEFRA and has recently been updated and sent free to all farmers.

<sup>11</sup> DETR, 1997. Economic Instruments for Water Pollution. DETR, London.

<sup>12</sup> David Garthwaite (2002) A Survey of current farm sprayer practices in the United Kingdom, Central Science Laboratories.

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<i>Voluntary Initiative Proposal</i>	<i>Duplication with existing measure—examples</i>
Information and advice on avoiding pollution of water eg leaflet “ <i>every drop counts</i> ” and roadshows.	Guidelines for applying Crop Protection Chemicals (first issued 1972) and Guidelines for the use of herbicides on weeds in or near watercourses and lakes (first issued 1978). The Water Code (issued in 1987, revised 1998) and The Green Code (issued in 1988 and revised in 1998) DEFRA pamphlets “Keeping pesticides out of water” and “Is your sprayer fit for work?” (updated 2002).
Crop Protection Management Plans	The CPA and NFU estimate that there is a 60 per cent overlap with existing Assurance Schemes. DEFRA’s proposed “Broad and Shallow” scheme (under discussion and requiring public subsidy).
Biodiversity Strategy and Action Plan	Repeats advice available from other sources eg Game Conservancy Trust, LEAF, FWAG (Farming and Wildlife Advisory Group).
Encouragement of Conservation Headlands	Advice listed above plus funding via agri-environment schemes eg arable stewardship.

It is clear that the Voluntary Initiative is in many cases simply freeloading on work which has been ongoing for several years and seeking to claim the credit for it.

#### 8. INCREASES THE RELIANCE OF FARMERS ON PESTICIDE COMPANY AGRONOMISTS MAKING PESTICIDE MINIMIZATION LESS LIKELY

Agronomists, both independent and those employed by pesticide companies, play a central role in passing on advice to farmers. Pesticide company agronomists provide advice to farmers responsible for over half the arable land in the UK. In our view it is essential that advice on cutting the environmental impact of pesticides through minimizing use is provided by agronomists independent of the commercial interests of pesticide companies.

The signatories to the Voluntary Initiative recommend that its proposed schemes for passing on environmental advice to farmers occurs via pesticide company agronomists and have proposed further environmental training for them. In our view these advisers will have a vested interest in selling their products rather than reducing pesticide use. Advice on preventative action to minimize pest and disease problems, substitution of pesticides with non-chemical means of control and reduced application frequency reduces the market for pesticides so is unlikely to be provided by pesticide company agronomists. Further training will not therefore be any guarantee that advice on reducing pesticide inputs would be passed on or result in changes in farming practice. Such advice will only be effective if it is provided free to farmers and is independent of commercial interests. The Association of Independent Agronomists has not been directly involved in drawing up the measures and was only allowed on to the steering group as an observer.

Friends of the Earth and PAN-UK also have serious concerns that the pesticide industry, through the CPA, has too much control over the whole Voluntary Initiative process. One example is the failure of the CPA to circulate detailed research information, despite the results being used to endorse particular projects. We consider that the CPA cannot have an independent perspective on this issue as it represents the vested interests of its member companies.

#### 9. FAILS TO STIMULATE OR ENCOURAGE INNOVATION IN PESTICIDE MINIMIZATION

None of the measures are aimed at finding alternatives to pesticide use. By focusing on measures which are about the “safe” use of existing pesticides (some of which were developed decades ago) the Voluntary Initiative is missing an opportunity to encourage innovative alternatives.

Finding alternatives, particularly to older products, would have a direct benefit to farmers. They will be facing a reduction in the range of pesticides available as a result of the EU review of active ingredients (AIs) when 320 older AIs will come off the market next year. Farmers are also increasingly faced with problems of pests and diseases developing resistance to chemical pesticides. Replacing one chemical with another as resistance becomes a problem may be good for the pesticide companies profits but for the farmer it will simply put off the inevitable time when resistance to the new chemical develops, taking them back to square one.

There are exciting new opportunities to revolutionise pest and disease control ranging from the design of more effective mechanical weeders, through computer technology to better predict pest and disease problems, to new forms of biological control and semiochemicals (eg pheromones). The potential and the impacts of

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these new methods will need to be assessed. This will require a commitment from companies to develop new products together with a significant increase in Government funding into this area of research and development. We strongly believe that the Voluntary Initiative will construct another barrier to this happening.

#### 10. USES THE RESULTS FROM A SINGLE FARM STUDY TO IDENTIFY A NARROW SET OF MEASURES TO TACKLE WATER POLLUTION

The measures proposed to tackle water pollution are largely based on just one study on one farm. The Cherwell study was produced by the agrochemical company Aventis (now Bayer Cropscience). The full evidence supporting its conclusion that the main source of surface water contamination is from farmyard run off has not been published or even circulated to the Voluntary Initiative Steering Group. The resulting measures are focused on farmyard practice rather than application of pesticides in the field.

Furthermore the farm used in the study is not representative because it was directly connected to the stream, a very unusual situation<sup>13</sup>. Given the number of variables affecting pesticide pollution of fresh water, it would be unwise to base narrow policy choices on a single-farm study.

#### 11. ADOPTS A NARROW VIEW OF BIODIVERSITY

The Biodiversity Strategy and Action Plan focuses on birds. Whilst this fits neatly with Government indicators it presents a very narrow view of biodiversity. As a result it fails to tackle specific problems with particular pesticides on other flora eg those listed under the Cereal Margin Biodiversity Action Plan and fauna and also fails to recognize the importance of soil biodiversity and the potential impact of pesticides on it. There is a lack of baseline data on soil biodiversity. However, action plans should not be based only upon those indicators for which baseline data exists.

One consequence of the narrow focus of these measures is that there is more attention on insecticide use than on the use of fungicides or herbicides, despite the latter accounting for the majority of sales of pesticide products.<sup>14</sup> The CPA draft Biodiversity Strategy even advises farmers to apply fungicides “as normal”.<sup>15</sup>

Fungicides present a risk to aquatic biodiversity. Frogs are in decline in the UK. Chlorothalonil, for example, one of the most commonly used fungicides, is according to the US EPA<sup>16</sup> “highly toxic to amphibians”. There is evidence that the herbicide atrazine has a hormone disrupting effect on frogs at very low levels, (as low as 0.1 parts per billion)<sup>17</sup>. Atrazine is found at levels higher than this in the UK<sup>18</sup>. These non acute effects are very important in terms of their impact on biodiversity but they are not acknowledged by the VI. The impact of herbicides on arable flora within the crop is also largely ignored despite the fact that weeds are an important source of food for birds and that a large proportion of the UK’s endangered plant species are specific to agricultural environments.

#### 12. IMPRECISE INDICATORS AND WEAK TARGETS

The Voluntary Initiative has had great difficulty in agreeing indicators. Their current paper on indicators follows several other papers. The indicators proposed fall into two camps: those that are useful to the Voluntary Initiative to monitor the progress of their projects; and those that would be of value to the government wanting to monitor the impact of the Voluntary Initiative in reducing the impact of pesticides on the environment. The Voluntary Initiative has real problems because of the lack of good base line data on some of the habitats likely to be affected by routine and poor pesticide usage. For this reason, the Voluntary Initiative has had to make do those indicators for which reasonable data exists. The Voluntary Initiative focuses upon grey partridge and corn bunting because the baseline data is good, but the package of measures likely to affect these two species free load on existing and publicly funded schemes. If, after the Voluntary Initiative is completed, there are increases in populations and distribution it will be impossible to say whether the Voluntary Initiative had any role to play, if any.

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<sup>13</sup> Crop Protection Association (2002) Handbook 2002.

<sup>14</sup> Crop Protection Association (2002) Best Practice for Biodiversity, A biodiversity strategy and action plan for the UK crop protection industry, draft report, September 2002.

<sup>15</sup> U.S. EPA AQUIRE database.

<sup>16</sup> Hayes, TB, Collins, AC, Lee, M, Mendoza, M, Noriega, N, Stuart, AA, Vonk, A Hermaphroditic, demasculinized frogs after exposure to the herbicide atrazine at low ecologically relevant doses. Proceedings of the National Academy of Sciences of the USA, 2002, 99 (8): 5476-5480.

<sup>17</sup> PAN-UK (2002) Atrazine levels threaten frog populations, Pesticides News 57, September 2002.

<sup>18</sup> NO copy.

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Other indicators proposed pose similar problems. Levels of pesticides in rivers only provide “a snap shot” for a tiny fraction of the year and need to be used in combination with aquatic diversity measurements. The latter are subject to other pollutants, eg sewage discharged, farm wastes and road run-off, again making it difficult to be sure any observed effect is down to the actions taken under the Voluntary Initiative.

Indicators of pesticides in water depend on the amount of effort used to promote them. For instance, meeting local catchments targets will very much hinge on the attitude and actions of farmers involved and that, in turn, will depend on the effort put in to promote it. In a small number of catchments a disproportionate amount of effort could produce real results but it would be impossible to replicate that effort on a national scale because of the excessive costs involved. This situation would be analogous to a minority party winning a by-election but failing to make any headway at the next General Election.

Many of the indicators used to monitor the effectiveness of the Voluntary Initiative are of very limited value because they do not monitor the actual changes in practice resulting from the initiatives to bring about the Government’s desired objectives.

The Voluntary Initiative indicators ignore several important groups of species eg arable flora and whole ecosystems eg the soil. The Voluntary Initiative also ignored residues in food. Although not directly related to the environment, the data on pesticide residues can be useful in monitoring which pesticides are being used across the range of farming types, unapproved usage and incorrect use.

Overall the Voluntary Initiative indicators may not be sensitive enough to indicate whether or not the Voluntary Initiative has had the impact the Government is seeking in the timescale available. The Voluntary Initiative problems stem from a lack of quality data and research. This reflects badly on the quality of the data packages required by PSD for approvals and the lack of interest from CPA members in really finding out about the impact of pesticides until challenged by the threat of a Pesticides Tax from the Treasury.

#### RECOMMENDED WAY FORWARD

We believe that in order to achieve the Government’s objectives a national pesticide reduction strategy is needed which sets clear targets for reducing the use and impacts of pesticides. The strategy will require a combination of new regulation and new Government funding. This funding could be raised by the introduction of a hypothecated pesticides tax. In addition we recommend that the existing levy on pesticide companies to pay for monitoring of residues in food be raised to allow improved monitoring not only of food but also of pesticides in the environment.

We consider that the key areas for funding from a hypothecated tax will be:

1. A significant increase in research and development into alternatives to chemical pesticides in line with DEFRA’s acknowledgement that “*there is a need for R&D which will provide more information on novel and non-toxic approaches to pest and disease control in order to devise alternatives to pesticides*”.
2. In order that such information is passed on in a useful way to farmers an independent extension service for farmers is needed. The free advice provided until the 1980s was very successful in encouraging farmers to intensify. We believe that now it is time to introduce a similar service to encourage sustainable farming methods.

It is essential that the pesticides tax is banded in order to ensure that the impacts of pesticide use are reduced effectively.

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