

House of Commons  
Environmental Audit Committee

**PESTICIDES: THE  
VOLUNTARY INITIATIVE  
Government Response to the  
Committee's First Report of  
Session 2002–03**

First Special Report  
of Session 2002–03

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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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## FIRST SPECIAL REPORT

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

**PESTICIDES: THE VOLUNTARY INITIATIVE: GOVERNMENT RESPONSE TO THE  
COMMITTEE'S FIRST REPORT OF SESSION 2002-03**

1. The Environmental Audit Committee published its report on Pesticides: The Voluntary Initiative on 26 November 2002 as HC 100.
2. The Government's response to the Committee's Report was received on 10 February 2003 in the form of a memorandum to the Committee. It is reproduced as an Appendix to this Special Report.

## APPENDIX

### GOVERNMENT RESPONSE TO THE HOUSE OF COMMONS ENVIRONMENTAL AUDIT COMMITTEE – REPORT “PESTICIDES: THE VOLUNTARY INITIATIVE” PUBLISHED ON 26 NOVEMBER 2002

#### *Introduction*

The Government welcomes the recommendations in this report proposing a new approach to the Voluntary Initiative in particular and to pesticides policy in general. The following paragraphs respond to all of the Committee's recommendations (the recommendations are quoted in bold type with the response following). The response also reflects the position in the devolved administrations as pesticide policy and a number of related issues are devolved matters. The majority of the Committee's recommendations are for the Voluntary Initiative itself. The Government's view on these does not, of course, bind the Voluntary Initiative signatories or other interested parties.

#### *Aims and Objectives*

**Paragraph 10: The objectives of the Voluntary Initiative lack clarity in the extent to which they include a reduction in pesticide use as an explicit aim.**

The proposals published in February 2001 entitled “Minimising the environmental impacts of crop protection chemicals” - which form the basis of the Voluntary Initiative - argue strongly against a policy objective of reducing pesticide use. The same document does, however, point to a reduction in use in recent years and highlights ways in which the Initiative (by promoting good practice) will avoid wasteful use of pesticides and, by implication, bear down on overall levels of use.

The purpose of the Voluntary Initiative is to reduce the impact of pesticides on the environment. The Government has long supported this objective and continues to do so; It is Government policy to focus on the environmental impact of pesticides rather than crudely the level of use. This is because impact depends on a number of factors, not just levels of use.

However, in many cases a reduction in absolute use will contribute to reducing impact. We will now study whether targeted use reduction might have a place within an overall policy of impact reduction. We have asked the new Chair of the Pesticides Forum to help explore this issue, informed by a new sub-committee of the Advisory Committee on Pesticides examining alternative approaches to pest control.

#### *Progress*

**Paragraph 17: 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.**

The Government understands that issues such as the availability of farm management software have made progress on these plans difficult. However, we agree with the Committee that progress with this important element of the Voluntary Initiative has been disappointingly slow so far. We understand that the Voluntary Initiative Steering Group intends to come forward with detailed proposals very shortly.

We agree with the Committee and with Professor Dent that the 30% target is disappointing. It is essential that the great majority of farmers take up the Voluntary Initiative measures that will benefit the environment. Achieving this will be difficult if there is not a similarly high uptake of Crop Protection Management Plans. We have made it clear to the Steering Group that we would wish them to substantially raise their sights on this issue. (There is more on incentives under the response to paragraphs 25 to 28).

**Paragraph 19: 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.**

It is reasonable that Crop Protection Management Plans should include existing requirements, policies and schemes. Indeed the merits of a robust framework for ensuring full compliance with these should not be under-estimated. However, the Plans should also aid the identification of local environmental features to be protected and of particular environmental risks to be guarded against. They should also, of course, allow the farmer to plan the uptake of Voluntary Initiative measures.

### *Incentivisation*

**Paragraph 25: The Initiative lacks a clear implementation strategy to provide incentives for farmers to alter their behaviour and take up best practice.**

The Government entirely agrees with the Committee that the Voluntary Initiative will not succeed without persuading farmers to do things that require effort and perhaps money. We also agree that the signatories have not yet produced a clear and comprehensive strategy to address this difficult but vital issue.

**Paragraph 26: 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.**

**Paragraph 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 Voluntary Initiative itself lacks.**

The Government agrees that many of the possible incentives to participation lie outside the Voluntary Initiative itself.

Wholesale regulation is not appropriate to underpin the Voluntary Initiative. But regulation could

be developed in particular areas if that would help the Initiative as a whole deliver real results. Similarly, the Government will not provide public money specifically to provide incentives for complying with the Voluntary Initiative. However, farmers are eligible for support from a range of publicly-funded schemes that encourage environmentally sound practice. Subject to successful pilots from this year, the planned Entry Level agri-environment scheme will provide a particularly ready route into environmentally-friendly farming for the broad spread of farmers from 2005. In Scotland, work is underway to develop and model a system of land management contracts designed to encourage whole farm planning and support multi-functional farming. The outcome of the Mid-Term Review of the CAP will influence decisions on the implementation of land management contracts.

The Government agrees that cross-compliance is one means of securing environmental benefits. The forthcoming Commission proposals on the Mid-Term Review of the CAP are expected to contain significant elements on cross-compliance which will be the subject of debate at EU and national level.

**Paragraph 28: 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 agrienvironmental schemes. Farming desperately needs a simpler approach.**

See reply to recommendation 48 (e) below.

### *Targets*

**Paragraph 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.**

The Government agrees that these process targets are important. They are a key part of the commitment made by the Voluntary Initiative signatories and are far more straightforward to measure than are environmental outcomes. They also measure important aspects of the Initiative; in particular the extent to which it has succeeded in getting large numbers of farmers to embrace good practice.

It is worth clarifying that, contrary to the statement in paragraph 33 of the Committee's report, the Government has never agreed the targets in the original Voluntary Initiative proposals. The Budget Report of 7 March 2001 said "The Government welcomes the latest set of voluntary proposals for reducing the environmental impact of pesticides use from the industry and the commitments made by the various stakeholders. The Government would like to see the voluntary package for pesticides implemented nationwide as soon as possible, subject to its concerns over delivery and monitoring being met." The issues of incentives, indicators and targets which the Committee has highlighted were uppermost in our thinking and were the reason why the caveat was included in the Report.

**Paragraph 35: 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.**

The Government recognises that indicators are of critical importance. We share the Committee's concern that the Voluntary Initiative has still to produce defined, clear and challenging targets, although some progress has recently been made in developing an approach that covers both the efforts made in delivering the Initiative and the results of these efforts in the environment at large.

**Paragraph 36: We recommend that the Government clarifies the criteria it intends to use to assess the effectiveness of the Initiative immediately.**

The Government has been anxious to let the Voluntary Initiative signatories design indicators and targets for delivery of the Initiative. But we are anxious to conclude this process soon and will do what we can to ensure that agreed targets are in place by the time of the Budget.

### *Monitoring and Resources*

**Paragraph 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.**

**Paragraph 40: 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.**

**Paragraph 41: 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.**

Agreed.

### *The 'Partnership' Approach*

**Paragraph 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.**

**Paragraph 43: 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.**

We agree that it would be inappropriate for Professor Dent to accept financial support from the signatories. The eight days figure was put to Professor Dent at the beginning of his term as Chair and he has not approached the Government for further paid time. We would be happy to review the situation with him if he wishes. As Professor Dent states in his supplementary memorandum

to the Committee (page 35 of the report), he has requested additional assistance with travel and subsistence costs and this has been agreed.

**Paragraph 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.**

Officials are in the process of commissioning work to develop a framework to enable subsequent assessment of the Voluntary Initiative. This will complement the indicators and targets put together by the Voluntary Initiative Steering Group and will enable a comparison of the environmental benefits of the Voluntary Initiative and of a possible pesticides tax. The study is intended to be completed by Summer 2003 and will subsequently be published. The review has not yet been commissioned and is not intended to examine the success of the Initiative, merely to provide some tools to help this task be carried out. Professor Dent has now been brought up to date with this work and it is regretted that, due to an administrative oversight, this was not done sooner.

**Paragraph 46: 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.**

The Government regards the Voluntary Initiative as an industry initiative and does not see itself as having an equal role in its delivery. However, we do agree that the Voluntary Initiative does not exist in isolation. There is a need for co-operation on some specific projects; this is already established in some areas and we have clearly signalled our willingness to consider proposals for assistance with other issues. We are also willing to enter into a dialogue on cross-cutting issues (see also answer to recommendation 48(e) below).

The Government has no intention of undermining Professor Dent's role or authority. He has an important job to do and we have no interest in making this more difficult. He has, as he told the Committee, direct access to Ministers and we hope that he will continue to approach Ministers and officials for support or advice.

### *Overall Strategy and Conclusions*

**Paragraph 48(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.**

The Government agrees that progress has been slow in respect of several critical aspects of the Voluntary Initiative – including the issues of targets, incentives and Crop Protection Management Plans which the Committee has highlighted. It will be important for the Initiative to demonstrate growing farmer uptake during 2003 and also the first progress on outcomes, particularly in respect of the water catchment projects.

**Paragraph 48 (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.

These points are covered in the replies to recommendations 10 and 25 to 28 above.

**Paragraph 48 (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.

It is too early to make a firm judgement of the success of the Voluntary Initiative. The Government will continue to make regular assessments of progress and (as described at 48(a) above) will be looking for real steps forward during 2003.

**Paragraph 48 (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.

**Paragraph 48 (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.

The Government has never seen the Voluntary Initiative as the sole means of tackling the environmental impact of pesticides. The regulatory system, statutory Codes of Practice, agri-environment schemes, best practice advice, research and development into alternatives to chemical control and into the safe use of pesticides all contribute to this aim.

The EU is developing a “Thematic Strategy” on the sustainable use of pesticides under the Sixth Environment Action Programme. The Commission’s initial Communication on this issue proposes that a centrepiece of the strategy should be national plans to reduce hazards, risks from the use of pesticides and to reduce dependence on chemical control. In December, the UK supported Council Conclusions endorsing this approach.

The Government does not intend to wait for the eventual adoption of the Thematic Strategy before beginning work on a national plan. It is beginning work on assessing those policies that contribute to the sustainable use of pesticides and identifying ways in which these can be joined up effectively and gaps filled. This will include joining up with work to develop smarter on-farm regulation through the whole farm approach. A range of different policies, Departments and stakeholders are involved and the development of the plan will be a complex undertaking.

Nevertheless, the development of the plan will be a priority for the Pesticides Safety Directorate in 2003.

Policy on pesticides and in a number of related areas is a devolved matter and further thought will therefore need to be given as to the best way to join up policies effectively.

**Paragraph 48 (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.**

The Government has put on record that it believes that a tax on pesticides, in conjunction with other measures, could be a useful tool for minimising the adverse environmental impact of pesticide use, consistent with adequate crop protection. However, the Government stated in the Pre-Budget Report of 27 November 2002 that, providing it is fully implemented, we believe that the Voluntary Initiative should be the most effective way of reducing the environmental impacts of pesticides

It remains possible, however, that the Voluntary Initiative will not deliver its objectives within a reasonable timescale. The Pre-Budget Report therefore also confirmed that the Government is carrying out further work and analysis on a possible tax or other economic instrument. Issues of the design of the tax and the use of the revenue raised will be included in this work, informed by the principles set out in the recent Treasury paper "Tax and the environment: using economic instruments".

**Paragraph 48 (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 midterm 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.**

As set out in earlier responses, the Government agrees that there are linkages between policy to ensure the sustainable use of pesticides and these other broader policy areas. The proposed national plan will create effective linkages.