

## **Wildlife and Countryside Link response to Defra consultation on the draft UK National Action Plan for the Sustainable Use of Pesticides**

Wildlife and Countryside Link brings together 39 voluntary organisations concerned with the conservation and protection of wildlife and the countryside. Our members practise and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together our members have the support of over 8 million people in the UK and manage over 690,000 hectares of land.

This response is supported by the following eight organisations:

Link members:

- Bat Conservation Trust
- Buglife - The Invertebrate Conservation Trust
- Friends of the Earth England
- The Mammal Society
- Plantlife
- Royal Society for the Protection of Birds
- Wildfowl & Wetlands Trust

Other organisations:

- Pesticide Action Network UK

### **General points**

Link believes that the draft UK National Action Plan (NAP) is wholly inadequate to achieve the sustainable use of pesticides in the UK.

Pesticides are a valuable tool in both agriculture and conservation land management, and are widely used in the amenity sector. In some circumstances they can provide the most cost-effective means of controlling a pest with the least risk of harm to non-target organisms and the wider environment.

However, pesticides also pose risks to human health and the environment. For example, pesticides are a significant pollutant of water bodies in the UK<sup>1</sup>, posing a threat to aquatic biodiversity and creating large clean-up costs for water companies. Modern pesticides have been designed to minimise their direct effect on non-target organisms, but can still have an indirect effect by removing organisms that form part of the food chain. Scientific evidence implicates the indirect effects of pesticides in the declines of some farmland birds including yellowhammer and corn bunting<sup>2</sup>. Concerns still exist over direct impacts for systemic pesticides, for example the effects of neonicotinoids on pollinating insects due to chronic toxicity and sub lethal impacts. Furthermore,

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<sup>1</sup> Pesticides Forum annual report 2011

<sup>2</sup> Boatman, N.D. *et al.* (2004) Evidence for the indirect effects of pesticides on farmland birds. *Ibis* 146(Suppl. 2), 131–143

over-reliance on pesticides can lead to populations of pests developing resistance to certain active substances, which causes major problems for farmers.

The EU Directive on the sustainable use of pesticides<sup>3</sup> sets out a clear framework to reduce these risks. It requires Member States to produce National Action plans that set out “quantitative objectives, targets, measures, timetables and indicators” and encourage the development of alternative approaches to reduce dependency on the use of pesticides. Link believes that the draft UK NAP fails to implement this requirement. The draft plan does not propose any new measures to address the negative impacts of pesticides, and relies heavily on voluntary initiatives with an absence of clear targets and monitoring.

### **Priorities for achieving sustainable pesticide use**

Link recommends that the NAP should, as a minimum, contain the following measures:

- ***Integrated Pest Management*** (section 17 of draft NAP). The IPM approach uses a range of management measures (such as crop rotations, appropriate use of fertilisers, encouraging beneficial organisms) to effectively control pests while reducing reliance on pesticides. IPM is at the heart of the Sustainable Use Directive (SUD) and has the potential to simultaneously improve pest control while helping farming to become more sustainable and resilient overall. Link suggests that to realise these benefits, government and industry should:
  - Develop a clear definition of IPM that builds on the principles set out in the SUD
  - Develop crop and sector-specific IPM protocols
  - Provide extension and outreach services to assist farmers in implementing IPM
  - Incorporate mandatory training in IPM for all sectors into existing assurance schemes
- ***Targeted protection for specific areas/water catchments vulnerable to the impacts of pesticides***, including protected areas designated under the Water Framework Directive (WFD) and the Birds and Habitats Directives (NAP section 15). This could take the form of voluntary safeguard zones backed up by the possibility of regulation should a voluntary approach prove unsuccessful. The requirements of each safeguard zone would depend on specific issues identified in that catchment or area, such as a use reduction target for a particular chemical causing non-compliance with the WFD. Voluntary safeguard zones should be well supported by advice, training and assessments.
- ***Informing the public about pesticide risks and alternatives*** (NAP section 11). Many of Link’s member organisations deal directly with members of the public. Our experience shows that people are concerned about the risks of using pesticides in gardens and want to know how non-target organisms can be protected. This information is often not readily available when purchasing chemicals for amateur use, except by performing an internet search. Other users may not even be aware of the risks and would be unlikely to seek information out. A leaflet offered to the consumer at the point of sale would be an effective way of delivering this information. This should raise awareness of risks, encourage correct use of the chemical and also promote low risk alternatives to chemical control.

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<sup>3</sup> Directive 2009/128/EC establishing a framework for Community action to achieve the sustainable use of pesticides

- **Phasing out substances of particular concern and developing suitable alternatives** (as noted in Article 4 of the SUD, but not covered in the NAP). The NAP should set out a process to allow the identification of substances that are most harmful to biodiversity, with plans to phase out their use. It should also be a priority to develop less harmful alternatives to such pesticides. In the past the loss of some pesticides has led farmers to revert to other, broader spectrum chemicals which can cause more harm overall. The objective should be to favour the use of the most appropriate chemicals and those least harmful to non-target organisms, and not to limit the choices available to farmers to the extent that they are forced to use inappropriate pesticides.

**Wildlife and Countryside Link  
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