Pesticide Action Network UK (PAN UK) -
Response to National Food Strategy call for evidence

Key recommendations (detailed below):
- Introduction of a pesticide tax
- Establishment of an Integrated Pest Management (IPM) research and extension service
- Introduce a pesticide use reduction target and environmental impact monitoring system
- Adopt mandatory government procurement of organic and local produce

The development of a National Food Strategy (NFS) drawing together the strands of food security, social justice, equitable incomes for farmers and growers and environmental sustainability is long overdue.

PAN UK welcomes this initiative and recognises that failing to address the issues associated with the use of pesticides in the food system will seriously undermine efforts to deliver the objectives outlined for the NFS, the 25 Year Environment Plan (25YEP) and other mechanisms aimed at ensuring a more sustainable future for UK agriculture. (See - Using Pesticide Policies for Implementing the 25 Year Environment Plan [https://www.pan-uk.org/25-year-environment-plan/])

Despite years trying to address problems of pesticides via voluntary measures, best practise guidelines and nominal support for IPM, pesticides use is rising and food production continues to pollute, contaminate and harm the UK environment. (See - The Hidden Rise of UK Pesticide Use [https://www.pan-uk.org/pesticides-agriculture-uk/])

The UK now has a very real opportunity to address these problems directly. Adoption of the recommendations outlined below as part of the NFS will help to deliver a truly sustainable food system for the future.

- Pesticide tax

The introduction of a tax on pesticides, based on toxicity, would have a twofold outcome – reduce the use of pesticides considered most toxic to either the environment or human health and provide funding for research into non-chemical pest control methods as a result of an hypothecated income stream. Whilst there is some debate in the UK about hypothecation of taxes, it is an established system in cases when those taxes are used for health or educational purposes – National Insurance and the tobacco tax for example.

A pesticide tax would be in-line with the Government’s intention, stated in the 25YEP Plan, to move towards a more effective application of the ‘polluter pays’ principle. Pesticide taxes have been adopted by a number of EU Member States. In fact the UK has in the past given serious consideration to introducing such a tax as a way of disincentivising the current overuse of
pesticides, particularly those that are most harmful. Experience of the Danish pesticide tax clearly shows that significant reductions in the use of the most toxic pesticide can be achieved when a premium is put on them. It is estimated that the Danish pesticide tax will generate revenues in the region of €90 million per annum, money that is reinvested in the agriculture sector. (See - Pesticide Use in Denmark https://ieep.eu/uploads/articles/attachments/504788d7-db01-4dd8-bece-ee7b9e63979e/DK%20Pesticide%20Tax%20final.pdf?v=63680923242)

- **IPM extension and research services for farmers**

In order to achieve a reduction in pesticide use and the development of a more sustainable farming system the focus needs to be on the uptake, development and ongoing support for genuine IPM in the UK. (See - Putting Integrated Pest Management at the heart of UK agriculture https://www.pan-uk.org/ipm-and-uk-agriculture/)

No single intervention would increase the uptake of IPM as effectively as the creation of an independent extension service for research, development and dissemination of IPM techniques. It would need to be Government-run and adequately funded, providing advice for farmers, entomologists and agronomists. Rather than offering top-down research, such a service would be driven by real life problems facing UK farmers and growers in their efforts to reduce the use of pesticides.

In order to succeed, the service would need to be free to access for farmers and growers which is something that the aforementioned pesticide tax could be hypothecated for. (See - Brexit and Pesticides – UK agriculture at a crossroads https://www.pan-uk.org/brexit-and-pesticides/)

- **A pesticide-use reduction target and improved monitoring system**

In order to support measures to reduce pesticide use, the introduction of mandatory reduction targets for pesticides harmful to the environment, persistent in water or that present a particular risk to operator, bystander or consumer health should be introduced.

The introduction of a pesticide use reduction target could drive a range of specific improvements and help coordinate the activities of multiple stakeholders around the achievement of that target. It would help consolidate existing Government activities and avoid the current situation where one initiative undermines another. For example, the Government’s stated intention in the 25 Year Environment Plan to reduce pesticide use could be rendered meaningless by commitments in a future Agriculture Law to improve productivity.

In order for a reduction target to achieve its objective, it needs to be coupled with a robust monitoring system that will not only note reductions according to the stated targets but also monitor environmental impacts.

In accordance with the recommendations in the 2017 paper by Defra Chief Scientific Adviser Professor Ian Boyd, (see - Toward Pesticidevigilance https://science.sciencemag.org/content/357/6357/1232) the monitoring required to assess progress on meeting a reduction target would improve our understanding of how pesticides affect the environment at a landscape scale and enable us to design regulation accordingly. Crucially, a clearly defined target would also provide UK farmers with certainty as to the Government’s direction of travel in terms of pesticide use, enabling them to make longer-term decisions.
Government procurement of organic

Support for the organic sector, particularly UK growers, should form a central part of the NFS. Public demand for organic produce is constantly growing and the benefits of organic farming systems to the environment are well-evidenced. Switching to organic can also increase incomes for farmers and growers.

The UK government can take a lead on this by adopting a procurement policy that supports organic and locally produced produce. The French government has already adopted a policy that at least half of all food bought by the public sector must be organic or locally produced. If the government is serious about making a more sustainable food system in the UK leading by example, to support agroecological, organic and local food producers would send a clear statement of intent.

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