



Conclusions from a BCPC Food Chain Forum  
***The impact of new EU legislation on UK food  
production, availability and price***

London, 6 June 2008

1. Pesticides in Europe are already highly regulated. However, new EU proposals contain approval criteria which could lead to loss of up to 85% of agrochemicals currently approved in the UK, because of their notional “hazardous” properties.
2. A number of the proposed “cut-off” criteria are poorly defined, and the benefits to human health if applied are not proven. A similar approach would be to ban a product that can be dangerous if misused or over-used (e.g. petrol, alcohol or coffee). There is available information to assess the effects of those criteria, if applied, to presently-approved UK agrochemicals.
3. The UK PSD Impact Study and follow-up work has highlighted the consequences of the proposed legislation in further restricting the agrochemicals available to commercial agriculture and the effect on food supply. Further work by ADAS and others has shown major adverse effects on yields, productivity and prices in a range of key crops. Similar studies have not been undertaken by any other Member States.
4. The UK studies show that without these agrochemicals, yields will fall, prices will rise and a large number of crops such as potatoes and other staples will be threatened. Many crops will become uneconomic. Absence of alternative pesticides will induce resistance to the few remaining products, and threaten integrated control strategies.
5. The agrochemical industry does not have the capability to innovate sufficiently to replace these products – even under the present regulations, the rate of new product introduction is less than the rate of removal.
6. The impact could not be mitigated by changes to management of individual crops, and so would drive wide-scale changes to UK farm structures, farming systems and rotations. It would also require a different attitude to crop quality from consumers and retailers and would impose adverse changes to diet.
7. If crops cannot be grown in the EU, more produce would need to be imported from elsewhere where these products can still be used, with implications for food security and carbon footprint.

8. Today, with food prices rising, Europe clearly cannot afford to implement indiscriminate hazard-based cut-off criteria without reference to impact studies on food supply/price, the environment and health across all EU Member States.
9. Unless action is taken as a matter of urgency, it appears that the EU process will continue inexorably towards implementation.
10. The UK should insist that the proposals should not be accepted in the absence of:
  - Evaluation of results of EU and Member State Impact Studies to determine the effects of the proposals on food supply/price, the environment and health.
  - Development of precise definitions of conditions for regulatory application of any cut-off criteria, e.g. “negligible exposure”.
  - A proven link, in practical usage, between regulatory application of cut-off criteria and benefit to human health or environment.
11. MEPs should be alerted to these consequences, and should ask the European Commissioner for Health for clear evidence that the proposals will:
  - improve health or the environment, and
  - have negligible effect on food production.In the absence of such evidence, they should request that European Impact Studies be done.