



**Open letter to The Rt. Hon. Hilary Benn MP:
Secretary of State for Environment, Food & Rural Affairs**

From: Hugh Oliver-Bellasis, Chairman BCPC and the Royal Agricultural Society of England

Dear Secretary of State,

As you know, the 23 June Council of EU Agriculture Ministers voted by qualified majority to accept “cut-off” criteria, to eliminate pesticides containing ingredients classed as hazardous - genotoxic, carcinogenic, reprotoxic or endocrine-disrupting. The legislation now goes to the European Parliament, which has called for further “cut-off” criteria, banning neurotoxins and immunotoxins.

This moves pesticide regulation to a **hazard**-based regime, in which “cut-offs” are politically determined. Just because a product has intrinsically hazardous properties does not mean it is dangerous. A cup of coffee contains many carcinogens - but levels are low and natural body processes deal with them. Your statement to Council pointed out that we are already exposed to endocrine-disrupting chemicals in our food and medicines.

Existing European agrochemical regulation is based on a scientific approach, assessing exposure in practice as well as intrinsic hazard - and then applying safety margins. It is based on assessment of **risk**, and has provided demonstrable protection of health and the environment.

In abstaining from the Council vote, you expressed strong concerns at the absence (UK apart) of EU impact assessments of the effect on food production. The EU proposals are not supported by studies showing that the “cut-offs” would improve health or the environment. You said that you could not support measures with significant adverse impact on crop protection, and not shown to have health benefits. We applaud your statement and robust stance.

We wish to support the UK’s position in deploring the EU’s retrogressive move, which sets dangerous precedents for regulation, not just of agrochemicals, but for any substances or processes. We believe the UK’s initiative in assessing impact on food production is professional and illustrates the flawed thinking elsewhere in Europe.

We wish to offer our support to the Government in urging the Commission and MEPs to follow the Government’s line and ensure that any new regulations are based on a scientific risk-assessment approach.

Countersigned by:

Professor Ian Crute, Director, Rothamsted Research
Professor Les Firbank, Head, North Wyke Research
Professor Mervyn Humphries, The Institute of Biological, Environmental and Rural Sciences
Professor John Macleod, National Institute of Agricultural Botany
Professor Peter Mills, University of Warwick HRI
Professor Chris Pollock CBE, Aberystwyth University
Professor John Pickett CBE, FRS, Head, Biological Chemistry Division, Rothamsted Research