

George Eustice MP
Minister of State for Farming, Food and the Marine Environment
Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

4th November 2016

Dear Minister

We are writing to you as a range of organisations involved in the UK food and farming sectors, to express our concerns at the European Commission's current proposed criteria for endocrine disruptors as required in the Plant Protection Products Regulation, and to urge the UK Government to take a robust position to ensure the final criteria do not inflict serious damage on domestic agricultural and horticultural production and the wider food industry. We are particularly concerned that the current criteria will lead to the withdrawal from the market of a significant number of important plant protection products, which will have an adverse impact on crop production in the UK, and on those sectors, both downstream and upstream, which rely on profitable and competitive agricultural and horticultural industries.

In order to strike the right balance between protection of human health and the environment on one hand and socio-economic impact on the other, it is essential that the final criteria identify substances that are of genuine concern. In our view, this balance has not been struck as the current criteria are based almost solely on the World Health Organisation International Programme on Chemical Safety (WHO/IPCS) definition, which by itself does not constitute criteria suitable to support regulatory decision making. The proposed criteria fail to allow all available and relevant scientific evidence, including potency, to be taken into account when evaluating a substance for its endocrine-disrupting properties. Based on the Commission's impact assessment, the proposed criteria will have a disproportionately negative impact on the availability of plant protection products for farmers and on sectorial competitiveness, agriculture, and trade. Given that all options under consideration, including those comprising elements such as potency, were found to offer the same high level of protection for human health and the environment, it is difficult to understand why the Commission has put forward these criteria.

In our view, endocrine disruptors can and must be regulated like most other substances of potential concern and be subject to risk assessment which considers both hazard and exposure. Although the Commission has proposed derogations for substances triggering the hazard based approval criteria by considering some elements of risk and exposure, introducing these elements by derogation increases uncertainty in the regulatory framework and signals a fundamental flaw in the basic regulation.

If the endocrine disruptor criteria are to be fit for purpose, all elements of hazard characterisation (and not just hazard identification) must be built into them, including potency, severity, and lead toxicity. Hazard characterisation is an essential step in the overall risk assessment of a substance and these elements are essential to ensure that regulators have the necessary tools to clearly distinguish between those substances which pose a real danger to human health and the environment and those that do not.

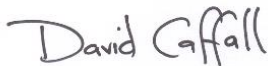
As proposed, these criteria will result in farmers and growers losing safe and essential tools that help them to produce the food that we all take for granted. A 2014 report by the Agriculture and Horticulture Development Board (AHDB) estimates an impact of at least £905m (10%) on industry farm-gate value. Also, as highlighted in the Commission's impact assessment, the loss of crop protection products increases the risk of pests, weeds, and diseases developing resistance to the products that remain. This could further impair the competitiveness of UK farming and horticulture, while potentially having dangerous consequences for food safety, for example, by hampering

farmers' ability to prevent harmful mycotoxins from entering the food chain. Additional impacts on competitiveness and public safety can be expected if the amenity sector loses access to key tools for weed and pest control, such as those required to maintain the safe running of railways.

We think it would be in the best interest of the UK to see the criteria changed to include elements of hazard characterisation. In order to allow all available and relevant scientific evidence to be taken into account when evaluating crop protection products for potential endocrine-disrupting properties, these should include not only potency, but also severity, reversibility and lead toxicity.

Although there is currently uncertainty about the future regulatory system of the UK following Brexit, until the UK formally exits the EU we will remain subject to EU law and regulations, and under the government's Repeal Bill proposals for some time afterwards, at least in the short to medium term. Consequently, we strongly urge the UK to continue to promote use of science-based risk assessment as the basis of regulation to support modern, productive and sustainable agriculture in Europe, and to strongly challenge the Commission's current proposals on endocrine disruptors on the grounds set out in this letter.

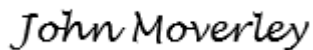
Yours sincerely



David Caffall, Chief Executive,
Agricultural Industries Confederation



Sarah Cowrick, Chief Executive
Association of Independent Crop Consultants



John Moverley, Chairman
Amenity Forum



Colin MacEwan, Head
British Beet Research Organisation



Dr Colin Ruscoe, Chairman
British Crop Production Council



Jack Ward, Chief Executive
British Growers Association



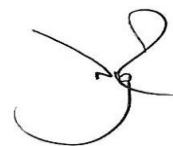
Dr Penny Mapstone, Chief Executive
British Society of Plant Breeders



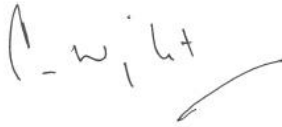
Helen Woolley, Director General
Country Land & Business Association



Nick von Westenholz, Chief Executive
Crop Protection Association



Nigel Jenney, Chief Executive
Fresh Produce Consortium



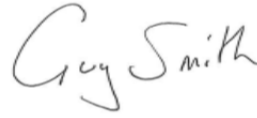
Ian Wright, Director General
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Jill Hewitt, Chief Executive
National Association of Agricultural Contractors



Martin Savage, Trade Policy Manager
National Association of British and Irish Flour Millers



Guy Smith, Vice President
National Farmers' Union



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Keith Norman, Technical Director
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