



Fresh Produce Consortium

Minerva House
Minerva Business Park
Lynch Wood
Peterborough
PE2 6FT

T: 01733 237117

F: 01733 237118

27 January 2009

Laura Gould

Editor

Fresh Produce Journal

Dear Laura

LETTER FOR PUBLICATION: RESPONSE TO DAVID SHAPLEY'S COLUMN

David Shapley speculates that the implications of the EU regulations to restrict the use of crop protection products may possibly not be so hard to bear. Unequivocally, we must not play down the implications of these regulations which will axe a number of currently key substances which are critical to the production of many indigenous crops including peas, carrots, parsnips, onions, and will affect fruits such as strawberries, raspberries, pears and apples.

Last year the Fresh Produce Consortium and others called for a full European impact assessment to be carried out before the regulations are enforced precisely because the EU failed to regard the need to make decisions on the basis of sound science – no surprise there then. However, in the UK we were fortunate to have scientific experts at the Pesticides Safety Directorate able to provide their evaluation of the impact of the EU proposals in the UK. This data, backed up by a number of studies (including PSD, ADAS and Cranfield School of Management), and not 'hearsay', has proved invaluable in providing us with a strong steer to lobby and raise awareness of the issues both in the UK and worldwide.

FPC informed members, including the FPJ, of the impact on UK and European horticulture of losing key products which are vital for the production of indigenous produce. In the long term there will be very significant losses in yields of carrots, for example. The loss of insecticides will lead to reduced yield and quality; the loss of herbicides, pendamethlin and linuron, will cause increased weed problems, with the potential for 100% crop loss. Few other herbicides will remain and will give a lower level of weed control. For example, there will be no products available for post emergence control of potatoes, thistles, docks or volunteer oilseed rape. There will be significant crop losses and increased production costs without triazole fungicides for prevention of rotting diseases. Some very important triazoles which are used as fungicides to protect against wheat and potato diseases such as rust and septoria will fall under the definition on endocrine disruptors and will face a ban. Mancozeb and maneb, both chemicals used to prevent potato blight are under threat.

It would be misleading to imply that the crop protection industry can quickly plug the gaps as key products are removed from the market over the following years. We are a long way past the days of DDT, and UK horticulture uses integrated pest management extensively as a responsible sector and has already a limited choice of crop protection products approved for use on its crops.

The horticulture industry is unlikely to have new alternative products for use over the next ten years, given that most substances awaiting evaluation are variations on existing substances, and the long lead-in times and additional costs for development and approval of products for use on its crops.

The European Council advised that a five-year derogation which will allow the continued use of active substances to control 'a serious danger to plant health' will only be used on an exceptional basis. In reality this will not provide a solution in a day-to-day working environment.


The UK Government is fully aware of the devastating impact of these regulations. Following a meeting with FPC and other members of the Food Chain Group Hilary Benn stated that the UK Government will vote against the regulations when they come before the Agriculture Council for final agreement in March or April. Unless the UK Government can encourage other member states to see sense then this stage is a formality and the development of the new regulation will go ahead. FPC will continue to request safeguards to minimise the impact on UK horticulture, however, the reality is that there may be little room for manoeuvre when it comes to fine-tuning the details of implementing the regulations in the UK.

Let's therefore not lose sight of the challenges we will face in providing a sustainable supply of fresh produce against the backdrop of feeding an increasing world population, competing pressures on agricultural land and the impact of climate change. With rising obesity levels across Europe we need to encourage consumers to eat more fresh fruit and vegetables.

The horticulture industry is maximising IPM techniques but on occasions crop protection products need to remain part of our portfolio to ensure that it can continue to provide a sustainable supply of safe and affordable quality fresh produce.

I apologise that this is a lengthy response to David's column but you will begin to appreciate that this is a highly complex and important issue – 81% of the industry say it will affect their business in some way, according to FPJ's poll of 23 January. FPC will continue to fight the industry's position as the regulation is developed and finally ratified before its implementation in 2010. It's essential that the industry does not become complacent. For those that trade elsewhere in the EU and the world, have you asked the question of your suppliers and growers 'Can you grow your produce without these 22 key products?'

Regards



Nigel R Jenney - Chief Executive