

PLANT PROTECTION PRODUCTS

Scott MacCallum visited the Pesticide Safety Directorate to get some answers to the industry's burning questions on the future availability of pesticides in the sector and on the dangers of using illegal products.

In recent years dates have occasionally resonated around the industry proclaiming when the use of pesticides would no longer be allowed on golf courses – a sort of doomsday you could say. These has invariably been followed by the counter argument that it's all hot air and will never happen - common sense with prevail.

So what is the genuine position and what is in store for the greenkeeping industry over the next few years?

To get an answer to that and a series of other questions where better to go than the Pesticide Safety Directorate (PSD), which is the regulatory authority for pesticides in the UK and the body in charge of developing and implementing the legislation which comes out of Westminster and Brussels?

Grant Stark and Paul Adamson are senior officials with PSD and they took time to outline the work of the Directorate and explain the background to some of the stories we read in the press and rumours that whistle round the industry.

And the answer to the burning question?

Well, yes there are a couple of key dates 2012 and 2014 - but it mightn't be as bad as is feared, and strenuous efforts are being made to minimise the impact it will have.

"2012, will see the completion of the pesticide active substance review programme. There are something like 900 pesticide active substances in use across the European Union. The review programme will see that figure reduced to around 300 – 400 by the time work is completed in 2012-comparative figures for the UK are around half those for Europe as a whole," said Grant, whose work covers the amenity sector. "That's a substantial loss of chemistry right across the European Union. It might mean that some methods of control may prove to be difficult" he explained.

On top of this, the EU is reviewing the law which sets out the criteria pesticides need to meet in order to be approved for use in the future. Grant explained that the law which sets these criteria is being developed under a complicated process known as the co-decision procedure. This involves the Council (the EU institution which represents the member states) and European Parliament (which represents the citizens) coming together with the Commission to agree a text. Before they come together for their negotiations, they look separately at a proposal and come up with a

number of amendments.

Grant said that the European Parliament has taken a relatively precautionary view on the risks associated with the use of pesticides and want this bar to be set at a comparatively high level. This could result in substantially more products being taken out of the system. In general the Council takes a less precautionary view and would like the bar set at levels that reduce risk to acceptable levels while enabling users to maintain sufficient protection from pests and diseases. While everyone accepts that the bar should be raised the effect of the Council and Parliament's amendments are relatively far apart on where this ought to be. Despite this there appears to be an appetite in Brussels to reach a deal by the end of the year on the new law.

The 2014 deadline is an important feature of another proposed new pesticide law – a directive on the sustainable use of pesticides. All professional users of pesticides will be required to use 'integrated approaches' by 2014.

An integrated approach is one where you don't automatically think of pesticides as the first port of call, but instead go back to the beginning and look at the original design of how everything is

from a lot of member states. It should mean best usage practices being drawn from across the EU." So where do those rumours and headlines about blanket pesticide bans come from?

"The prospect of a blanket ban was raised in discussions on the sustainable use directive. The European Parliament considered on a series of amendments prepared by its Environment Committee – which took an extremely precautionary view on the risk associated with the use of pesticides and so proposed some severe restrictions, including bans on use in public spaces. The Parliament as a whole though was less precautionary and rejected calls for the more severe restrictions.

"Indications are that the Council and Commission are less precautionary still, so we await to see what sort of text emerges when the three institutions come together towards the end of this year. It's important to keep an eye on the discussions to make sure overly severe restrictions are not re-introduced, lobbying MEPs is an effective way of making your voice heard," said Grant.

He added that in his opinion golf was quite well placed to cope with the forthcoming changes, compared to other sectors, as he understood

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set up so as to minimise the incidence of weeds coming through and consider a range of vegetation management options. A more sustainable approach if you like. "This approach is already very well embedded in agriculture and its use of pesticides. Many of the contracts signed between farmers and supermarkets make specific reference to farming in an integrated fashion. Greater use of integrated approaches in the amenity sector may help offset some of the difficulties associated with the loss of products" said Grant.

The new directive will require member states to set up national action plans for pesticides and work toward the reduction of risk from using them. Grant said that the directive is expected to include a number of 'best practice' measures on things such as training of users, distributors and advisors, testing of application equipment, protection of watercourses, public spaces and conservation areas. Grant explained, "We already have these sort of measures in the UK but they are missing

there was already a good knowledge of what is "best practice".

PSD puts a lot of emphasis on people going out and getting professional advice from organisations such as BASIS, who can guide users in the right direction. "Our understanding is that the golf course sector understands the need to use pesticides in a way which is consistent with 'best practice' and takes specialist advice. We would look to encourage all users to go out and look at their vegetation management strategies and investigate integrated management approaches - take a more holistic approach rather than just using chemicals," explained Grant.

What about the enforcement of legal controls on pesticides?

PSD was formed in 1987 following on from the first pesticide regulations which came into being the previous year. Initially it was a division of the Ministry for Agriculture, Fisheries and Foods before becoming an Executive Agency of DEFRA. It was

VIEW FROM THE AMENITY FORUM

An integrated approach to managing golf courses has been a priority for greenkeepers for some time. In fact within the amenity sector it has been the greenkeepers who have led the way with good management practices aimed at reducing, and hopefully eliminating the need to use a pesticide. But despite good management there will continue to be a need to use a herbicide, fungicide and/or an insecticide to establish and maintain first class turf. The question most greenkeepers ask me is how long will we be able to continue to have pesticides available to use? We are already losing the products we need to control worms, leatherjackets and the many other pests of turf. Herbicides are also being withdrawn – diuron, dichlobenil to name a few.

The UK has had a statutory legal framework for the control of pesticides use for over 20 years and overall it works well. This risk-based approach considers carefully evaluated scientific data, periodically reviewed by an independent body, it is a good system so why change it? These Regulations are backed up by a Code of Practice, training schemes to maintain up to date certification, and some very sophisticated application equipment.

We know that in Denmark no pesticides are allowed on golf courses but so far we have not seen any evidence to justify this decision – it is based on ‘concerns’ for safety! Is it a real possibility that this approach could be adopted in the new EU Directive for the sustainable use of pesticides? Greenkeepers need to know that the UK negotiating team are working very hard to get more support for the UK position as at the moment it seems that our approach is in a minority within the EU.

The decision will ultimately be made by MEPs voting in the EU Parliament in September/October and everyone who will be affected by the decision



must act now and contact their own local MEPs to make sure they understand the impact a prohibition on the use of pesticides in amenity situations will have. As Chairman of the Amenity Forum I will be writing to all MEPs again with a briefing note to raise their awareness. If you would like a copy to help you speak to your MEP contact Bob Joice at robert.joice@farmline.com , or Jon Allbutt at jon@jonallbutt.co.uk .

Jon Allbutt, Chairman, Amenity Forum

AMENITY FORUM CONFERENCE

The Amenity Forum is hosting a one day conference at the Heath and Safety Executive Headquarters in London on October 2.

Included on the programme Chaired by Ian Mearns, Vice Chair of the Local Government Association Environment Board, will be a Legislation Update on EU and UK Pesticide Policy delivered by Adrian Dixon, of the Pesticides Safety Directorate, and Jo Kennedy, of the Environment Agency, while Jon Allbutt, Chairman of the Amenity Forum, will speak on Determining the Usage and Usage Patterns of Amenity Pesticides across the UK.

Also included on the programme is a Keynote Address from Lord McKenzie, Parliamentary Under Secretary at the Department of Work and Pensions with responsibility for the HSE, and Solutions to Best Practice Management - management from three managers in key amenity areas.

In total the day includes seven papers and a closing Panel Session and Chairman's Summary. Anyone seeking to attend should contact: Bob Joice, The Amenity Forum, 43 Park Drive, Mirfield, West Yorks WF14 9NJ or email: robert.joice@farmline.com

moved to its present home in York, in September 1994. It has recently become an Executive Agency of the Health and Safety Executive and its 180 staff carry out critical evaluation of accredited data that is provided by companies which want chemicals approved.

Paul is part of a team charged with policing the pesticide regulations in the UK and attempts to clamp down on the illegal use of unapproved products.

"In simplistic terms if a product is not approved for a job it is a breach of the law to use it. Indeed the way the law works is that all pesticides are banned unless they have specific approval" explained Paul.

The general tightening of controls on pesticides over the last 20 years has already lead to the loss of pesticides which we now consider to have unacceptable effects. Generally more toxic, persistent and potentially environmentally damaging chemicals have been replaced by more targeted, pest specific and less damaging pesticides.

"This reduction in availability can be a problem if you are dealing with hard to control pests or weeds and this may tempt people to use an unapproved or otherwise illegal product such as using an agricultural product in an amenity situation. The loss of some organophosphate insecticides, which although highly effective were also pretty indiscriminate in destroying beneficial insect species, means you really need to think

through your use of pesticides."

The use of illegal or unapproved products is something which Paul and his team spend a lot of time investigating and they have some severe sanctions for those who are caught using any unapproved chemicals.

"If someone is using an agricultural product in an amenity situation the risks are likely to be different to those which they are used to. It might be the risks are very similar but it could be that they are very different leading to real danger to the person who is applying the chemical."

"Or it may be that the environment suffers because the product gets into water more easily or is more concentrated. For each approved use of a product the risks and hazards to the operator and the environment are taken into account when approval is granted. Using the product in an unapproved way means that is no longer the case.

Paul is well aware of the pressures some greenkeepers are under to find the cheapest option to control a pest or weed but the dangers of using a product in a non-approved areas and manner are real.

"We have powers to seize illegal products and have them disposed off and to recover the costs from the perpetrator - it's one of the ultimate sanctions. If we take a case to prosecution the maximum fine for each offence is £5000 in a Magistrates' Court or an unlimited fine in Crown

Court and that fine may be against an individual or a golf club."

However, Paul is not a fan of prosecution.

"Prosecution is usually a last resort as it's very expensive and time consuming, from our perspective it is more effective to seize the offending pesticide and charge for disposal and to advise on how to avoid problems in the future. We can also issue enforcement notices which require corrective actions to be taken, and because these have no simple right of appeal they are an effective enforcement tool."

If people do go ahead and continue to use off-label products what's the worst case scenario?

"That depends very much on the product but effects could range from minor issues such as skin irritation to more severe effects. It is the operator who is put at risk initially and that is something I want to avoid," said Paul.

The same is true from an environmental perspective where unapproved pesticides may have a range of short or long term effects gradually degrading an eco system for example damage to watercourses or knock on effects on wildlife.

So the message coming out is despite the possible reductions in the availability of chemicals you currently rely on don't take unnecessary risks and use illegal or unapproved products. If you have not already done so, to take a look at your management practices to ensure that you are not caught out when 2014 comes around.