Dear Commissioner,

REPLACEMENT TO EC DIRECTIVE 91/414/EEC CONCERNING THE PLACING OF PLANT PROTECTION PRODUCTS ON THE MARKET

I am writing on behalf of the Pesticides Forum, a key stakeholder body in the United Kingdom. Background on this Forum is given as an Annex to this letter.

At the latest meeting of the Pesticides Forum (17 June 2008) members learnt more about the current proposals for a Regulation to replace the existing Directive 91/414/EEC which is currently going through the ‘co-decision’ procedure. Members were shown the Impact Assessment on the proposed Regulation produced by the UK Pesticides Safety Directorate together with the data which was used to develop this assessment. However, without access to an equivalent assessment undertaken by the European Commission it is impossible to come to an informed decision on the impact of this proposal on the whole of the EU. I would welcome your views on when such an assessment will be made public.

All the members of the Forum agreed it was vital that there was a full, balanced and evidence based understanding of the proposals being put forward both by the Commission and the European Parliament especially in respect of:

- Human health;
- The environment;
- Food production; and
- Socio-economic impacts
In particular members were anxious that there should be clear definitions for assessing hazard triggers, such as Endocrine Disruptors, in order that a reasonable interpretation of the differing proposals could be made. Please could you advise us as to when this fits into your proposed timetable?

We fully recognize that in preparing these proposals the Commission are obliged to encourage the whole industry (producers and users of pesticides) towards a continuous cycle of adaptation and improvement. However, it is important to understand how long it can take to implement such actions without having a disproportionate impact upon the industry as a whole and potentially on consumers, public health and the environment.

It is also important that the definitions applied to pesticides are not applied in isolation and the Forum would encourage you to consider greater dialogue and exchange of information with others involved in the assessment of chemicals (such as REACH). In particular, there should be greater effort made to gain agreement on definitions, such as for Endocrine Disruptors, and to seek more commonality of approach towards the assessment of impacts.

If you require further clarification on the suggestions put forward by the Pesticides Forum please do not hesitate to contact me at the address above.

A copy of this letter has also been sent to European Commission Vice President Gunter Verheugen and Commissioners Marianne Fischer-Boel and Meglena Kuneva as this is of relevance to the Commission's High Level Group on the competitiveness of the agro-food industry, Hiltrud Breyer MEP (EP Rapporteur), UK MEPs and to UK Ministers with responsibility for pesticides.

Yours sincerely,

James Clarke
Chairman
Pesticides Forum
BACKGROUND ON THE PESTICIDES FORUM

The Pesticides Forum has the following terms of reference:

- To bring together the views of those concerned with the use and effects of pesticides;
- To identify their common interests;
- To assist the effective dissemination of best practice, advances in technology, and research and development results.
- To advise Government on the development, promotion and implementation of its policy relating to the responsible use of pesticides.

The Forum membership is made up from a wide-range of organisations from those within the agriculture and horticulture industry (including the crop protection industry, farmers and growers including the organic sector and the training and advisory sector); those involved in the sale and distribution of foodstuffs including the major retailers who organize many of the crop assurance schemes); those interested in human health (including PAN-UK, consumer groups and Trades Unions looking after sprayer operators); through to those interested specifically in environment and conservation issues (including wildlife groups). The Forum is also supported by a wide range of Government and Non-Governmental organisations either involved directly in the approval of pesticides in the UK through to those with interest in the impact of pesticide use. Further information on the work of the Pesticides Forum can be found on its website at: http://www.pesticides.gov.uk/pesticides_forum_home.asp.