

# ***ROSEMARY and DAVID DARLEY***

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## **Changes to Statute 91/414**

Dear Mr. Deva,

MEP's are shortly going to be asked to vote on the issues raised by the draught legislation. At risk of teaching a granny (granddad!) to suck eggs, the essence of this is as follows.

Agricultural and Horticultural Pesticides have legislation governing their Approval for Use, but it is proposed to tighten the rules. Should a substance be deemed to have *any* element of risk, to environment, wild life, and humans, that it will be removed from the list of products approved for use. The degree of risk is immaterial: the case is proven if *any* risk is substantiated.

Life is full of risk/benefit decisions. Do I go on that fairground big dipper? (Risk: vomiting/it leaving the track/requiring laundry services. Benefit: excitement/fun/a good tale to tell down the pub). Do I take paracetamol for my splitting headache? (Risk: stomach bleeding/drug dependency. Benefit: I feel *so* much better/can get on with work). Become an MEP? (Risk: strident letters from constituents/raised blood pressure. Benefits: ah, well now, would I dare to presume to spell out these many and varied delights? No!). You no doubt get my drift. Nothing is safe. Everything is a risk. But a little risk is acceptable, if the benefit can be recognised. Fun, relief, job satisfaction, whatever. Oh, incidentally, I loved an example of risk/benefit choice that someone gave me – which is safest mode of travel; aeroplane or submarine? Answer; the aeroplane – they've never left one up there!

Right, now for this directive. Your choices are thus.

*Ban all chemicals that have a possible risk to humans, wildlife or environment.* (Risk: throwing the baby out with the bath water/reducing amount and quality of food production/food shortages/raised food costs/reliance upon imported food/demise of UK agriculture. Benefit: rich people not affected/perceived to be Green/loved by the organic movement/ highly profitable to foreign farmers.)

*Reject the assumption that any risk is unacceptable.* Balance the value of an unscientific and illogical proposal, against the currently exceptionally well regulated processes for approval of pesticides, by independently staffed bodies such as the Advisory Committee on Pesticides (ACP). Ask – "Is it broke? Nope? Then it don't need fixin'."

What do I know about all of this? Fortunately, quite a lot, actually. Though the son of an RAF pilot, I was a lot more proficient at Botany and Zoology than flying. Firmly earthbound, I obtained a Botany degree, and worked my way into the late and lamented ICI's Agricultural Division, specialising in crop protection products. That was in January 1970. In the early 90's, I 'flew' the Zeneca Agrochemicals Technical Enquiry and Help Desk. A bit like Mastermind, but without being able to choose a speciality subject. I now work in the field for an agricultural crop production company, again as a salesman.

To be honest, we're pretty rotten salesmen. But why? Well, because this isn't like selling a load of cheap blankets off a market stall, to disinterested buyers in the height of summer. I've seen it done – it's fantastic to watch; the sellers employing all the tricks in the book to do it. That is being a true salesman.

No, we can't get away with that. Not the least because we want to keep seeing our customers, on a repeat basis. The blanket salesman would have been leaving a trail of smoke over the horizon long ago.....

We all need a good technical background, a powerful ability to analyse problems befalling crops (think of being a doctor to patients who can't speak, but turn yellow and die regularly), and a very well founded technical base from which to recommend cures and treatments. And if we fail to do this? We get chucked off the farm, after the farmer has a weed choked, disease ridden, bug filled crop to harvest. Oh, and if he gets a really brilliant harvest, we can still get chucked, as we have spent too much! So we do risk/cost/benefit judgments on a daily basis. We all love hearing the favourite press line about "Farmers covering the countryside in pesticides." It's like the mythical Chinese woman who produces a baby every 3 seconds. Where are these people? In 33 years of doing the job, I've never found a farmer willing to splash out money willy-nilly on expensive chemicals. Just the opposite!

We have *hugely* valuable crops to look after, which we could wreck without sound knowledge, with appalling consequences for us, the farmers, and the land. You don't just walk into doing this sort of job: you have industry standards to meet, exams to pass, abilities to demonstrate, and ongoing on the job training. We each have to meet annual training targets, set by our Professional body, the British Agrochemicals Standards Inspection Scheme (BASIS).

Well, I've told you that we are brilliant, but what of the products that we recommend? In my 33 years of doing this job, nobody has ever paid me enough to risk my own life for the firm. I'm not going to recommend something that is unsafe, for there's every chance that I might end up eating it! "But lots of chemicals have Hazard Labels on them, and Maximum Residue Levels that are set for each chemical that may occur in your beef burger, or apple, or parsnip." Yes, everything has its safe limits. Just as does caffeine in coffee, vitamin supplements, the aforesaid paracetamol, even sunshine levels. In moderation, or on an occasional usage/uptake basis, you have no problems. But our industry has extreme limits placed on it.

Take pesticide residues in water. No pesticide should be found in excess of 1 part per billion in drinking water. Total pesticides per sample must not exceed 5 ppb. Why 1 ppb? That is the finest level of detection possible. Does it distinguish between relatively toxic products, and relatively benign ones? No. Why not? Because science is deemed irrelevant by the rule setters. Namely, your good selves. You work on "if you find it, it must be bad."

Are there exceptions? Well, if a product is deemed to be natural, the answer is yes. This is the sheer lunacy of the legislation. If propiconazole, a fungicide, is found in excess of 1 ppb, then the water sample fails its quality test. Never mind that you don't know what it is, or how poisonous (it's a benign product that could be sprayed over you at the recommended in-field usage rate, and you'd never notice.) What *would* grab your attention would be if someone sprayed you with arsenic solution. Hey, wait a moment, that's stuff's dangerous – I understand arsenic! Yes, you would, because you have accurate information about it. The concentration permitted in water, *simply because it is a naturally occurring product*, is 40 parts per million. Not 1 per billion, but 40 per million. I think that works out at 40,000 times more arsenic than propiconazole. If it's *natural*, but really dangerous, that's OK, we'll approve it. If we don't understand what it is, and is unnatural, whoa Betsy! We can't be having that, and don't you waste my time explaining how safe it is, because it can't be true. And there, Mr. Deva, you have the basic premise for the governance, by governments, of pesticides.

Our rules are tight enough. Apply our rules to the use of Calamine lotion. You know, it's used to soothe skin that has been burnt, by sun or heat, or is generally damaged. It soothes, it cools, and Mum's put it on their babies. So they should, as it works. Our industry would label it approximately thus: "Contains phenols. If in contact with skin, wash off immediately. If in contact with eyes, irrigate immediately, and seek medical attention." Excessive? Yes, in the real world that you and your colleagues know, and are familiar with. But the chemical industries standards beat your rules into a cocked hat, in order to convince legislators' that we have left no stone unturned. Yet you would be considered insane to put

Calamine lotion into the same ruling as the proposed changes to Statute 91/414, but that is *exactly* what you should be doing.

If this amended Statute is passed, the likes of me and our whole industry will be regarded as charlatans, imposters, liars, and irresponsible polluters. I know that we are not. Apart from our hurt feelings, what will be the other consequences? The loss of our prime fungicide, herbicide and insecticide products. Yawn, yawn, farmers are always whinging. There won't be shortages. Oh yes there will! Let Mother Nature take her course? For example, one wild oat plant is as competitive as *seven* wheat plants, and one blackgrass plant is as competitive as *three* wheat plants. The proposed legislation will remove from sale all the weedkillers that control these weeds. You can't grow cereals in such circumstances.

Greater brains than I, (the list is a long one) have worked out that we'll need 1 million more hectares of land to produce the same amount of food as we do now. And where will that be coming from? Don't forget that RSPB, Natural England, the Green lobby, and hoards of people who eat farmers food, but have no real understanding as to how they get it, won't let farmers rip up 1 million hectares of parks, gardens and, presumably, the top of Snowdon, as none of us out here can see how otherwise you can find enough new land! Read the submissions of ADAS and MAFF, and other bodies tasked with examining the consequences of what you legislators are about to do. It's quite bad enough that you are letting that nice Mr. Putin be in put charge of our energy supplies, but it would be outrageous if you should make him responsible for feeding us as well!

To kill off our farming industry, vote for the legislation change. If you want to feed us all, safely and economically, vote it out. This country has a responsible, efficient, and perfectly well regulated farming industry.

That is precisely what your choice will have to be. Good luck!

Yours sincerely

David Darley