

EU Exit – Pest Control Threat or Opportunity?

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Overview

- Regulatory Regime
- Advantages
- Disadvantages
- UK Industry Structure
- Conclusions



I am not a regulatory specialist!
....and these are my personal views

Regulatory Regime



EU regulation 1107/2009

- Hazard-based criteria
- Candidates for Substitution
- Endocrine Disrupters
- Basic Substances
- Low Risk Substances
- Biopesticides

24.11.2009 EN Official Journal of the European Union L 284/1

I
(Acts adopted under the EC Treaty/Euratom Treaty whose publication is obligatory)

REGULATIONS

REGULATION (EC) No 1107/2009 OF THE EUROPEAN PARLIAM AND OF THE COUNCIL
of 21 October 2009
concerning the placing of plant protection products on the market and repealing Council Directives
79/117/EEC and 91/414/EEC

THE EUROPEAN PARLIAM AND THE COUNCIL OF THE EUROPEAN UNION,

Parliament by its Resolution of 30 May 2002⁽¹⁾ and the Council in its Conclusions of 12 February 2003⁽²⁾ identified a number of issues for the Commission to address.

Having regard to the Treaty establishing the European Community, and in particular Article 37(2), Article 95 and Article 152(4)(b) thereof,

www.hse.gov.uk/pesticides/brexit.htm

GB Regime

- Active substances now authorised by HSE
- Maximum Residue Limits (MRLs) now set by CRD
- Products continue to be authorised by HSE
- All decisions to be signed off by Ministers
- Pesticides are devolved

National Criteria

- Always applied by GB when in the EU
- Guidance notes – issued by EFSA
- Considerable frustration across the EU as to differences in national criteria



HSE

**Health & Safety
Executive**



Revealed: Far higher pesticide residues allowed on food since Brexit



Exclusive: Unlike the EU, Great Britain has slashed protections for scores of food types



Advantages

- New active substances
 - Speedier authorisations
- Reviews of existing a.s.
- Guidance
 - HSE did not always agree with EFSA guidance
- Alignment with other regulatory regimes



Disadvantages

- GB is a smaller market than EU
 - Cereals still significant
 - Minor crops a problem
 - Biopesticides a problem



Industry Structure – GB vs EU

- Differences in holding size
- Differences in marketing arrangements
- Differences in government support
- Differences in production methods

Examples

- Cherries
 - 760 hectares in UK
 - At least half grown under protection
 - Protected cherry crops much rarer in EU
 - Data gap for protected crops



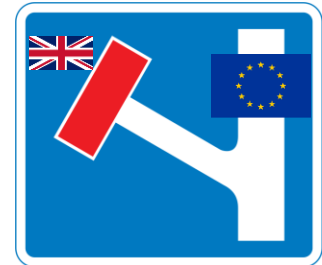
Examples

- Abamectin
 - Active substance was due for renewal
 - Consortium supported in EU
 - Authorisation holder in GB has not supported
 - Will continue in EU
 - Finishes in GB on 31st October 2025



Divergence

- EU has ongoing active substance and MRL reviews
- GB has yet to start both these processes
- Result:
 - EU changing MRLs, GB hasn't
 - Divergence



Example

- Indoxacarb
 - Revoked in EU in 2022
 - EU MRLs now set at LOD
 - Authorised in GB until 28th February 2026
 - If used in GB cannot export crop to EU





Trade Implications

- GB compliant can go to NI
(but no further!)
- Anything direct to EU must
be EU compliant
- Growers, agronomists,
retailers unclear
- Import tolerances diverging
for third countries



Problems for Speciality Crops

- Horticulture

- 12% of agricultural output 
- 34% of crop output 
- 3% of cropped area 
- About 10% of the crop protection market 

- Cereals rule!

Light at the end of the tunnel?

- Pesticides now big policy unit in DEFRA
- Consultation has been encouraging
- Subsequent silence, less encouraging!
- Understand the need to encourage more biopesticides and low risk pesticides
- Will we see legislative change?

Light at the end of the tunnel?



Department
for Environment
Food & Rural Affairs

www.defra.gov.uk

UK National Action Plan for the Sustainable Use of Pesticides (Plant Protection Products)



National Action Plan

- Last version published in 2013
- Should be renewed every 5 years
- *“A review of the 2013 NAP is a statutory requirement as well as a commitment under the 25 Year Environment Plan”*
- Draft Published December 2020
- Consultation closed 26th Feb 2021
- Responses to consultation published Dec 2021
- 5 DEFRA Secretaries of State since
- Must be signed off by devolved governments
- Expected ‘in 2025’

How easy is it to register a new insecticide?

- Answer – not very!
- Dose rates
- Engineering solutions?
- Keep it in the glasshouse!

SAY NO TO DRIFT
CHLORPYRIFOS

Air Induction
Hollow Cone
spray nozzle

TVI 80°



Necessity is the mother of invention!

- Less (or no) insecticides
- Alternative methods available but:
 - More expensive?
 - Less easy?
 - Less confidence?

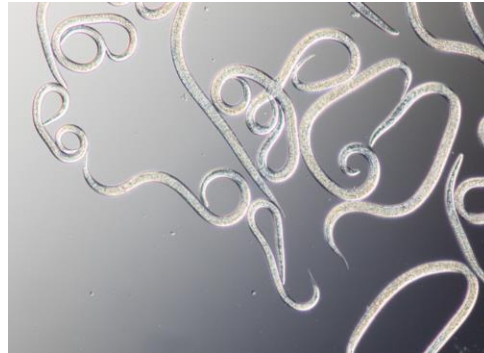
Evaluating commercial IPM strategies for sustainable codling moth (*Cydia pomonella*) control in apples

A collaborative industry project

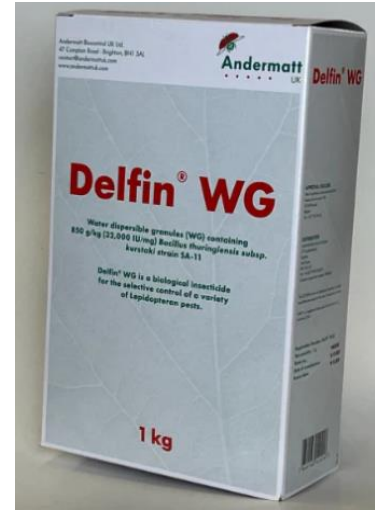




Credit: Andermatt UK



Credit: Koppert



Credit: Andermatt UK



Credit: Andermatt UK



One more advantage?

- Border controls
- Opportunity to keep out non-natives?



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Compensation called for as more than 200 plant destructions listed by Defra after Pochazia interceptions

Climate Change

- Range of non-native pests potentially extending

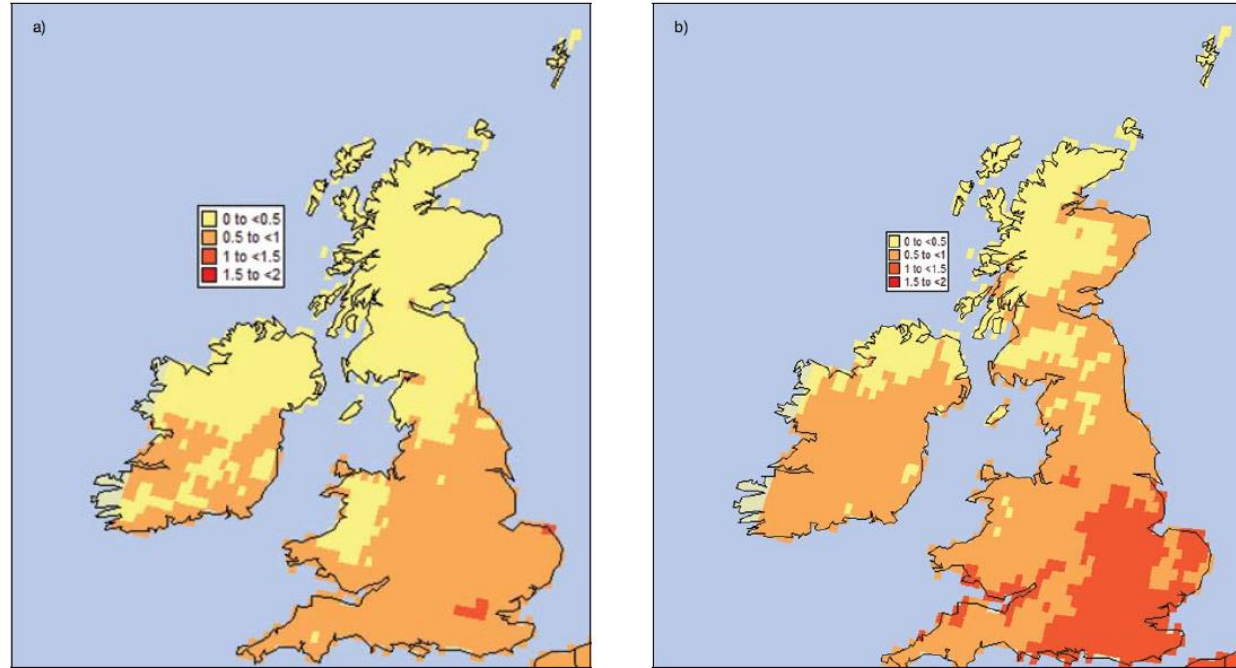


Fig. 5. Potential number of *Halyomorpha halys* generations per year under a) historical 30-year (1961–1990) average climate and b) projected climate for 2050.

Powell et al., 2021

Conclusions

- Not yet good news for minor crops
- Products being withdrawn from GB market
- Pipeline is getting slower?
- DEFRA making right noises
- It all depends on the NAP!



Thank you for your attention. Any questions?

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