



The All Party Parliamentary
Game and Wildlife Conservation Group

Meeting Minutes

Thursday 16th November 2017

12:30pm -13:30pm

Room C, 1 Parliament Street

Attending:

Name	Representing	Name	Representing
Sir Nicholas Soames	Chairman & MP	Peter Walker	Wilson Wraight
Angela Smith	MP	Jo Woodhams	NFU
Geoffrey Clifton-Brown	MP	Tom Keen	NFU
Lord de Mauley	House of Lords	Sophie Hutchinson	BASC
Alastair Leake	GWCT	Julian Little	Bayer Crop Science
Gillian Kenny	GWCT	Paul Leonard	BASF
Joel Holt	GWCT	Robert Lingard	RSPB
Henrietta Appleton	GWCT	Peter Melchett	Soil Association
Abi Kay	Farmers Guardian	Matthew Stanton	WWF
Jerome Starkey	The Times	Sandra Bell	Friends of the Earth
Patrick Galbraith	Shooting Times	Zoe Davies	Wildlife & Countryside Link
James Somerville-Meikle	Countryside Alliance		
James Legge	Countryside Alliance		
Sarah Mukherjee	Crop Protection Association		
Nick Mole	Pesticide Action Network UK		

Minutes:

The two guest speakers addressed the questions posed in the invitation, namely:

1. Has the precautionary principle ("PP") stifled innovation and proved costly to business?
2. Would the UK as a stand-alone WTO trading nation be challenged if it retained this approach?
3. Is there sufficient science to support changes in health and welfare standards that the UK consumer would accept?
4. Would deviation from the precautionary principle undermine attempts at a FTA with EU27?

5. What would a domestic regulatory system look like? And how would it be enforced?

The individual points made in response to these questions are reported by speaker. Questions were asked of individual speakers but for the purposes of these minutes they are recorded at the end.

Sarah Mukherjee, CEO Crop Protection Association – key points:

Sarah commented that whilst diminution of environmental standards was in no-ones interest, proving no harm (through application of hazard-based precautionary principle (“PP”)) was a high barrier to entry resulting in ossification of pesticide applications and techniques. Innovation needs to be taken into account but the regulatory hurdles mean that it takes a further 5 years for a new technology such as RNA to reach market approval in the EU as opposed to the US (risk based approach). By implication associated investment and funding would be focussed in the new market (the US). She referred to a European Political Strategy Centre report which highlighted that regulation has negative impacts on innovation particularly if prescriptive standards are applied and to European Council opinion which suggested that when updating policy the Innovation Principle should be applied. Therefore EU institutions feel there is room for innovation in the PP in order to allow the evaluator to take into account a fuller picture in the risk assessment. At the end of her talk she posed the question whether game changing innovations of the past such as Penicillin would have passed the Precautionary Principle as applied by the EU.

With regard to potential impacts on UK seeking new trading partners post-Brexit, Sarah highlighted that the US and Australia had challenged the EU hazard-based approach to regulation through the WTO on the grounds it was insufficiently grounded in science.

As to whether the consumer would accept any changes to standards, she felt that it is easy to sow doubt in a consumer’s mind, despite science suggesting the contrary (glyphosate as example). However the agro-chemical industry has not been transparent enough in the past and so there is a job to be done in building public trust and understanding.

She commented that as the current regulatory system in the EU is designed for 28 countries and therefore resource intensive, there is scope for a new domestic regulatory system to better reflect the needs of the UK ie risk-based, transparent and flexible in order

to adjust to the fast moving regulatory environment. In addition the key lesson learnt when seeking regulatory alliances elsewhere, such as working with the Quadrilateral dialogue (US, Australia, Canada and New Zealand), is that the UK is a relatively small agricultural player in the global market.

Nick Mole, Policy Officer Pesticide Action Network UK – key points:

(Noted that Nick was heavily delayed by transport problems and so gave an abbreviated version of his talk). Nick started by saying that lack of clarity on possible post-Brexit policies posed more questions than answers. However the debate did provide the opportunity for UK agriculture to become more sustainable and environmentally friendly.

He supported the PP as a common-sense mechanism to trigger protection when scientific understanding is incomplete. He argued that this should be a driver to innovation as it should not be about making the same mistakes over and over again through producing replacement chemicals, but a trigger to finding new alternatives. Instead of controlling nature, agricultural systems should seek to work with nature and become more sustainable. Whilst this may affect the profits of the agro-chemical industry, alternative approaches may well stimulate new industries thereby creating gains elsewhere (he gave the move to non-fossil fuel energy as an example).

He felt that any domestic regulatory system would have to closely mirror the EU in order to facilitate free trade with the likelihood that the EU would become more precautionary in its approach. He emphasised that UK domestic law must enshrine the PP and polluter pays principles in particular.

Of the potential new markets identified 4 or 5 had expressed interest in organic products providing an impetus for increased organic farming in the UK.

Q&A session – key points:

Geoffrey Clifton-Brown MP asked whether co-existence would be possible if the UK regulatory system allowed products to be produced at different standards for different markets. Sarah Mukherjee (SM) responded that it already happens concurrently with organic and non-organic farms and even at field level. Theoretically therefore it would be possible as long as the process is clear and transparent.

Sandra Bell (FoE) agreed that regulation can stimulate innovation as the industry had already started to develop resistant strains during the debate on whether neonicotinoids should be banned. Her experience was that farmers were frustrated that there was not enough research or funding to look into alternative approaches. SM rejoined that the risk of stifling innovation tends not to receive the same attention as alternatives. However she agreed that low tech solutions should be explored and pointed out that Integrated Pest Management and Integrated Farm Management were examples of this and that the Voluntary Initiative was helping farmers consider various options for crop protection on their farms in the context of promoting responsible use of pesticides.

Paul Leonard (BASF) raised the problem of the polarity of the debate. The PP was there for a good reason but it should not create an innovation vacuum. Many EU CEOs had signed up quickly to the balancing Innovation Principle as they were concerned about the relationship between knee jerk reactions and practical reality. Later he raised the point that it is not the regulation or the principle that is wrong but the interpretation which can differ by country. The UK needs to decide how it will interpret the PP – and other principles such as proportionality and non-discrimination.

Peter Melchett (Soil Association) spoke of the opportunity to encourage farmers to lead the research into alternatives (he cited Innovative Farmers a network supported by the Soil Association, LEAF, Innovation for Agriculture, ORC and Waitrose) and the need for more Government support for such initiatives. He also flagged that there were four key principles relevant here – PP, Polluter pays, damage at source and animal sentient beings.

SM commented that explaining risk to a broad audience is difficult although everyone accepts a certain degree of risk on a daily basis. What is needed is a better understanding of the relationship between risk and hazard; in other words the proportionality of the risk. Abi Kay (Farmers Guardian) queried whether the UK would apply the PP more proportionately than the EU and what would fill the gap left by the Chemicals Regulation Division (part of REACH).

Angela Smith MP asked what the EU regulators position was on glyphosate, whether the speakers felt that science was being politicised in the EU and whether the licences were too short term and therefore a barrier to innovation? Nick Mole (NM) said that the Regulator had put forward a variety of suggestions for 3,5 & 7 year approvals but that it was not yet

clear which would be voted upon. He agreed that science had become politicised and said this needed to be embraced as it was only likely to get more so. He thought a 15 year licence was sufficient. SM commented that it took £200m and 10 years to bring a product to market and so it was often difficult for smaller companies to finance market approval for innovative products. Banning pesticides is increasingly a political decision with the current debate on glyphosate based on only 1 paper flagging a probable risk of cancer. A recent US study of agricultural workers had shown no link.

Tom Keen (NFU) added that all parties needed to embrace politicisation but questioned how to get the Public involved in an informed debate with integrity?

NM said that the NFU needed to help members meet the challenges of changing pesticide availability but that PP needs to be behind every decision made. He criticised their funding of a "save glyphosate campaign" and said the money would have been better spent on better stewardship of the product. He felt that the public was already onside and concerned about harm from pesticides and that NGO's were there to support these concerns regardless of how "real" they might be.

SM added that the public is now a long way from the food production process and that the crop protection industry needed to explain better what they did, why and what the benefits are. It then becomes a social justice issue related to the access to and availability of cheap food.

Peter Walker (Wilson Wraight) observed that the debate revolved around an interpretation of the balance between risk and benefit and was concerned that the PAN UK stance was that all pesticides are bad and that ultimately the dosage applied was a key factor. NM responded that they were not opposed to every chemical; merely emphasising the need for non-chemical alternatives to be explored.

Sir Nicholas commented during the debate that time will be required to effect any changes and that money should be available to support those changes. At the end he thanked the guest speakers and those attending for an interesting and excellent debate and closed proceedings at 13.30.

23rd November 2017