

Questions on Goal 1 – Better Regulation

Question 1 – In the context of maintaining current high levels of protection for human health and the environment, what can we do to make the regulatory system for pesticides simpler and more efficient?

It is very important to have a rigorous and robust regulatory system, particularly when it is about protecting human health and the environment, and we support a process based upon understanding the science and analysing all the evidence. However in recent times within the EU system, the process of approvals and re-approvals has become extremely extended and political. Therefore to those working in the sector it has become difficult to understand the process and highly frustrating. For example in the case of glyphosate at its last approval, quite rightly extensive review of all the evidence and science was undertaken by all the experts and the conclusion was it was safe. However the discussions then moved away from the evidence, and became very extended, creating uncertainty and cost; difficult for those involved to understand.

It is worth also making the point here that in implementing the regulatory system, when deciding to withdraw an active or product, the process needs to consider fully unintended consequences. As an example, there are now no approved pesticide solutions to tackling chafers and leatherjackets in amenity grass, yet it remains a major issue and the consequences can have significant safety implications. So in the case of airports, no effective control of the pests can encourage bird strikes to eat the pests creating a major safety hazard. Those responsible for maintaining sports turf in such situations may look at using unapproved products. This is not a reason for keeping an unsafe product but it is a reason for carefully managing the process of withdrawal, especially in amenity, where the number of available products any way is much lower.

Simplifying the system should also address the ever escalating cost of approvals and reviews. We are aware that some manufacturers have potential replacement products but are put off seeking approval because of cost in relation to the size of the amenity market.

Question 2 - What could we do to increase transparency about the way that evidence is used to inform decisions on the regulation of pesticides?

This relates to the last comment. When reviewing or approving there is need for clarity on stating the process and then trusting the outcome to make the decision. We believe greater communication of the process within the sector would have advantage and the Amenity Forum would be willing to assist in this and in the implementation of an appropriate communication strategy.

Question 3 - How can we best ensure that our regulatory systems keep up with innovation and scientific development including new technologies?

Undoubtedly there is real scope for innovation and scientific development and indeed much is already being achieved. We certainly support any initiatives seeking to increase collaboration and communication involving researchers, users and the relevant agencies. We address this further in a later question. What is important is that regulatory systems are established which can respond to innovation and developments flexibly and quickly. If we review such innovations on the same terms as traditional pesticide approaches we may again miss other factors. When evaluating any approach to weed, pest and disease management, we must review all life cycle consequences including environment, carbon footprint and sustainability as well as health matters.

Question 4 - What actions could we take to expand and improve the current Biopesticides Scheme, to increase the availability of approved biopesticide products and better support potential users?

Undoubtedly the development of bio controls has enormous potential and is already being applied in areas of amenity. However the way in which these are regulated and approved needs to be reviewed so as to ensure application of such techniques do not have the previously referred to unintended consequences. Whilst at first sight a bio solution may be embraced as a non pesticide approach, the full life cycle analysis is important. Currently this process is not well understood and indeed the Amenity Forum is already engaged in discussion with CRD about this and how the Forum might better assist in supporting potential users. We would support improvement of the current scheme and stand ready to help in any way with this, providing the views of the important and essential amenity sector.

The current regulatory system can create a somewhat grey area of biological products which may have properties for control of pests but do not fall under PPP requirements, if looked at in terms of ingredient mix. These issues are increasingly emerging as the number of PPPs for amenity use declines. In particular at present it refers to control of pests on sports turf where there are now no approved PPPs for leatherjacket and chafer control or for managing earthworm casts on say cricket pitches or indeed golf greens. Because of the pressures put upon them by those responsible for maintenance to produce high quality surfaces for owners and users, those responsible look for alternatives within an integrated approach. These might have a primary approach to improve soil structure or similar but include a secondary pest control function. The regulatory scheme needs to ensure such products when used for pest control for example, are in some way covered by appropriate PPP regulations.

These comments do not indicate non-support for bio solutions but a need for consistency in review and their assessment

Question 5 - What are the priorities for research to better understand the impacts of changes in regulation?

We would support the commitment to further developing scientific research and agree the headings set out for this on Page 20 of the consultation document. We also support the establishment of frameworks for collaboration with partners. We urge that this has full involvement from those at operational level to increase transparency and proper communication. The Amenity Forum would be very willing to engage with this and we think it important.

In understanding impacts, there may be potential for supporting specific stewardship type projects where all factors can be taken into account and we would welcome further discussion on this.

Question 6 – What other suggestions do you have for improvements to the regulatory system for pesticides?

There is concern in the sector that sometimes the particular circumstances and aspects of amenity are not taken fully into account, given the largely and understandable agricultural focus. In amenity often additional hurdles and requirements seem to be imposed as add-ons. When looking at products aimed at grassland for example the situation of use on farm grassland and on sports turf are very different. The process for the latter needs to be based on the latter not on the former with add-ons.

Additional registration requirements where the loss of an active ingredient(s) means no suitable chemical alternatives are available is a real issue in amenity. We would welcome discussion on ways to deal with this, with potential positive outcomes for all involved. There also needs to be serious

consideration to the problems that the additional requirements of birds and small mammals studies placed on amenity have had on the impact on new registrations and loss of previously approved products. The requirements are over and above what is required in agriculture, very expensive and are holding back newer chemistry which could be efficacious at lower rates of active ingredient.

Questions on Goal 2 – Promoting the Uptake of IPM

Question 7 - How can we best develop and support management and advisory services to deliver an increase in the uptake of IPM?

The structuring of giving advice and operations is different to agriculture. Very often those undertaking the work also advise the customer of the best approach. It is not as clear cut and needs to be taken fully into account in developing support systems.

The Forum fully supports continuing professional development and we would suggest, in answering this question, that some setting of a requirement for CPD for those operating in amenity would be appropriate and a very good way to develop and support management and advice in the uptake of IPM. The Forum would welcome further discussion to find the best way forward for this given the current structure and diversity of the sector. (This is picked up again in a later question)

Question 8 – What else could we do to ensure that pesticide users are fully informed about the benefits and practicalities of IPM approaches?

It is worth saying at this point that the term integrated pest management can be confusing when applied to many amenity situations. The term tends to say that this is just about pest control. That is why the Amenity Forum in communicating with the sector has adopted the term integrated approaches to the management of weeds, pests and diseases.

For a significant portion of those working in amenity management, the focus is on weeds, in situations such as roads, paths, rail lines, invasive weeds etc. In 2019, the Forum with the help of some external funding, produced a specific guidance and template for integrated weed management. This has proved to be a very useful and used document for those in our sector. We believe that a similar set of guidance and template would be really helpful to users covering pests and diseases and integrated approaches. We believe that if external resource were made available this would be a highly valuable document and certainly help inform users.

The Forum also has a set of guidance notes on all aspects of amenity management including integrated. We also have a well promoted You Tube site which includes video clips on all aspects of the NAP including integrated approaches.

We feel that if the Amenity Standard became a requirement under the new NAP, this would ensure that all involved in professional amenity situations supported the objectives of the Forum and were members of an approved assurance scheme under the Standard. All such approved schemes advocate integrated approaches.

Question 9 – How can the promotion of recognised standards be used to encourage the uptake of IPM, in amenity, agriculture and more widely?

In responding it is firstly important to re-emphasise that the amenity sector is hugely involved in IPM and indeed it has been promoted and adopted for some time in our sector. This point has been made previously but is worth emphasising. For just one example, golf green keeping is IPM; all the actions greenkeepers take today are essentially elements of an IPM programme and this applies in other sectors too. As another specific example, for over 10 years integrated disease management trials, sponsored by commercial companies, have been undertaken with the Sports Turf Research Institute (STRI) and promoted across the sector. So in amenity management of weeds, pests and diseases, integrated is very much in the thinking of professionals operating across all sectors of amenity. Undoubtedly there are some who still defy such approaches but this is the same in any sector.

As said in the answer to Question 8, we believe for amenity, the key driver to see an increased uptake in integrated approaches would be the adoption of the UK Amenity Standard, launched in 2020 as a requirement for all professional operators in weed, pest and disease management with proper enforcement. Adoption of IPM is at the heart of the Standard.

Question 10 – What suggestions do you have for a communications campaign to encourage more uptake of IPM?

We feel the use of the term integrated can sometimes be defined quite loosely and dare we say incorrectly. Integrated means to us making use of all tools available in a particular situation, including plant protection products and alternatives, with the aim of effective management, proper targeting and minimisation of pesticide use and minimising environmental impact and the carbon footprint of operations. Indeed in many situations a mix of methods is the optimum. This is where the Forum produced guidance pack and template can prove so useful to operators.

We believe the answer to this question is in two parts. In terms of communicating to the amenity sector itself, we would strongly advocate building upon what the Forum has already done within the resources available. This is very much a core action for the Forum through our website, regular updating events, publications and more. We really do feel that the Forum is well placed to be at the centre of such communications. It is recognised across the sector, already is established as a source of guidance and information and with experience to offer in what works best and what does less so. We would be very happy to discuss further. Even if external agencies were to be used, it would, we believe, be vital that they work through the Forum to get the sector engagement needed

In terms of communicating to the public, such a campaign is vital and essential. Far too often current messaging becomes polarised and over influenced by specific lobby groups. The fact is that if we are to seek to produce safe, healthy, sustainable and fit for purpose amenity spaces in the most effective and economic way, an integrated approach is vital, involving the use of approved plant protection products and other methods in the correct manner to suit the circumstances. In the case of invasive plants, plant protection products can often be the only appropriate solution and we need to communicate to the public that this can be done safely by professional operators.

The Forum has established a website GetMoving www.getbritainmoving.uk which includes video clips, information sheets and more, all designed to inform the public. We also will be running a public awareness week in 2021. We would urge any communication campaign around IPM to build on this approach and we would be happy to discuss further.

In addition, the Amenity Forum has developed strong links with the administrations in Scotland, Wales and Northern Ireland as well as England. With each we have created implementation plans to best disseminate IPM and inform organisations about such matters. In Scotland and Wales this has involved direct communication from the governments to local authorities and public bodies and we are working to establish similar processes in the other two nations. Whilst the National Action Plan is a UK wide one, it is important to recognise national differences and ensure the most appropriate mechanisms are in place for its delivery by building effective and strong partnerships.

Question 11 – How could we use financial support schemes to offset risks associated with IPM?

There is a strong case for introducing some form of financial support scheme especially for such bodies as local authorities who create tenders and use external contractors. Whilst these tender documents often include requirements for membership of assurance schemes etc., far too often the ultimate decision is taken on cost. Professional contractors, operating to the Amenity Standard, are in the very best position to advise and implement the best approaches to particular situations based on an IPM approach but they can find that they lose out to those who take the cheapest route, often far from integrated. There does need to be a look at how incentives could amend this behaviour.

Of course as mentioned previously, adoption of the Amenity Standard as a requirement in tenders would have immediate impact.

Question 12 – What should government do to facilitate research on the availability of effective methods of pest control?

Whilst there is research undertaken in terms of amenity management, clearly the major focus is on agriculture and it is not always possible to adopt results from this. We do feel that there would be a place for bringing all this research together and creating a body or bodies to oversee the research being undertaken and make recommendations on areas for the future. Some while ago, those involved in turf grass research did put forward the idea of a Turfgrass Research overarching body. This at the time did not attract government support but we would propose this decision worthy of review.

Another issue around amenity research is how best we can take it and apply it. In this period of major innovation in approaches, such communication is vital. The Forum does produce an occasional publication trying to do just this but we believe there is a real need here. The Forum, suitably resourced, might be well placed to deliver on this.

Question 13 – What other suggestions would you make to improve uptake of IPM approaches?

As said in earlier responses, amenity is an important and indeed essential sector but it is diverse. The establishment of the Amenity Forum some 10 years ago provided an organisation embracing all sub sectors to co-ordinate and promote best practice. Again we emphasise that in amenity integrated approaches have already made significant inroads and often are standard practice. However if we are to fully embrace and improve uptake of IPM approaches, we would suggest three things are paramount:

- *Build on the success of the Amenity Forum*
- *Introduce the Amenity Standard as a requirement*
- *Enforce fully the above by strengthening procedures and resources and speed of action*

Questions on Goal 3 - Safe and Responsible Use

Question 14 – How should we raise awareness of the health, environmental and legal risks of using professional products without having the correct training and certification?

To return to an ongoing response here, the introduction of the Amenity Standard as a requirement with appropriate compliance, addresses this. This would require those involved to have suitable qualifications and engage in CPD as well as support for the Amenity Forum. It would drive out of the sector those not at the right standard. Frankly there are many who will not act unless required to do so and they see the penalties. The Standard must become an essential element in tenders and indeed all amenity operations

There already exists information on the health, environmental and legal risks of using professional products. However some see that as there is no requirement for a Standard performance or indeed penalty, why they should become aware. We do believe that the some is getting smaller but it exists.

We would also take opportunity here to urge that when assessing approaches, a total life cycle method is used (see later question). Assessing health and environment risks is complex and must look at all impacts not least carbon foot printing.

Communication in our sector is always an issue and covers three main groups, those within the sector, the public and those who sit not directly within the sector but make the ultimate decision. These include the procurement teams, the owners of amenity spaces and their agents. The latter have a duty of care and are ultimately responsible. As said, adoption of the Amenity Standard as a requirement would be a big step forward but there needs to be ways to improve direct engagement and understanding with bodies such as the Highways Agency, Network Rail, councillors etc.

Question 15 – What would be the benefits and challenges of introducing a legal requirement for certification of pesticide advisors?

Whilst we support in principle this introduction as we have already said in a previous reply, the distinction between advisers and operators is not as clear cut in amenity as in agriculture. However introduction of the Amenity Standard as a requirement could address this. Of course there will be some in the sector suggest this increases costs but the benefits far outweigh this. The Forum fully supports the Amenity Standard and this would certainly help address the issue of advisers. There is considerable merit in a case for the advisers name appearing on any specification for weed, pest and disease management and certainly those involving plant protection products. Advice, recommendations, and specifications could be signed off by the person giving them, like a doctor's prescription.

Currently the obligation is on the buyer of pesticides to ensure they are used by professionally certificated operators. There is argument to strengthen obligations on sellers so they check for proof that the buyer is appropriately qualified.

We are aware that in the amenity sector, as the document states, we may not have achieved the engagement expected in terms of the Amenity Register. However one of the challenges of this diverse but essential sector is that a number of organisations operate their own CPD schemes. For a number of years, the Amenity Forum has collected data on these to get a better understanding of CPD involvement. Nevertheless it is recognised more needs to be done and there is support for approved

CPD becoming a requirement going forward. Currently we can face the statement that this is not required, nobody asks for it etc. This links to the need for an effective enforcement process.

Question 16 – What more should retailers be doing to inform amateur pesticide users about the actions they can take to control pests more sustainably?

Whilst on the face of it amateur use is small compared to that in agriculture, horticulture and amenity, it is an area where more focussed intervention may be needed. We do not support the withdrawal of safe amateur products but we do believe there needs to be more advice and control in their purchase. At a retail outlet where such products are available, there should be a suitably informed, and ideally qualified person, on hand to give advice and be involved in monitoring. Attention needs to be given to labelling on amateur products with simplified messaging on usage and disposal. The messaging designed for professional users can be unsuitable and not read. There does need to be clearer messaging and guidance. So our view is yes there is onus on retailers to monitor more such their sales and have in store guidance but there is also an onus on government to ensure the messaging on products sold is clear using everyday language.

Question 17 – How can we best target inspection and enforcement to prevent unsafe and environmentally damaging pest management practices?

Whilst we believe in the majority of cases best practice standards are implemented, undoubtedly in others they are not and far too often the statement is made by these that as nobody enforces requirements, why do it. We believe a targeted campaign across the UK to highlight examples would have a profound impact on achieving full compliance. Such an approach we are told was adopted in Ireland we understand with great impact.

Of course the key way forward, as stated previously in a number of ways, is to ensure any organisation using plant protection products professionally has operators all with recognised certification and are members of an assurance scheme approved as meeting the Amenity Standard. The enforcement could then target areas not seen to operate at the Standard with large effect.

Question 18 – What kinds of challenges need to be addressed in order to ensure safe disposal of unused pesticides and pesticide containers?

There are clear requirements and guidance available in amenity in this area and provided they are followed we do not see this as a major issue in the professional amenity sector.

Question 19 – How can we best make sure that members of the public know what to do when pesticide products are withdrawn from sale?

This is both important and very difficult. By increasing awareness of withdrawals, what we certainly do not want is for the public to panic and dispose of these inappropriately, down the drain for example. The Amenity Forum has a public facing website Get Moving and this could be used as a vehicle for increasing public awareness. Again it is important that the messaging, when purchasing, covers disposal using straightforward language. There would be merit in local amnesty schemes for householders with product on shelves, held possibly for many years, to have access to safe disposal centres.

Question 20 – What further actions are needed to ensure that equipment used for application of pesticides complies with safety requirements?

In answer to this the first thing to say is that the proper training of operators is a key way to ensure equipment complies. However we certainly support current testing requirements but again the importance of showing those involved that it will be enforced is vital. Otherwise there can be some who wonder why they should comply. There is a strong case for simplifying the rules on requirement as this often confuses. Currently the rule in amenity is that if a machine is over 5 years old and the operator has his or her feet of the ground in its operation, it needs to be tested but then renewal periods vary depending on use. There is a case for simplification here. Also there does need to be clearer inspection of new equipment as to whether it meets standards. We believe there is a case for new equipment to be tested as part of the manufacturer or import process. Whilst cost can be a factor, some put forward the idea of annual testing or at least sell certification of such annual testing by operators. No formal test certificate is required for hand held equipment but an annual self-certification inspection is recommended.

The key answer here to the question though is better enforcement of existing requirements.

Questions on Goal 4 – Targets, Metrics and Indicators

Question 22 – What are the priorities for data collection and research on pesticide usage?

Undoubtedly getting as full and accurate picture of plant protection product use in amenity has not proved easy to date. The last amenity pesticide usage survey was in 2016 but this produced a sketchy response based on too few participants. The challenge here was that the contractors used basically an agricultural survey to collect the data which was not suitable for amenity. Further to discussions with CRD recently, the Amenity Forum has been directly involved in the design of the 2020 survey due to be issued in February 2021. This has sought to simplify returns, focussing on the key issues and we very much hope that this will allow the contractors to produce a much greater response and hence reliability of data.

It is vital to have a better data set. One thing that would significantly improve matters would be if manufacturers reported publically on the amount of amenity approved products produced and distributed. We recognise that there is some competitive commercial confidentiality sought but production of such figures on a reasonably regular basis would prove really helpful.

The development of the UK pesticide Load Indicator is interesting and we await developments with interest.

Question 23 – What are the priorities for research on the environmental impact of pesticides?

We certainly support more research attention being given to this area. There are few such projects for amenity and those that are often simplify matters in reporting. When assessing pesticides or the alternative approaches, it needs to be assessed on a lifecycle analysis basis, including impacts on carbon foot printing as well as other issues. There is certainly scope for more research on just how to evaluate the environmental impact of all methods of managing weeds, pests and diseases, chemical and non-chemical. The need for this increases as more biological approaches and innovatory approaches are adopted. All methods must be assessed in the same way as plant protection products

in their total environmental impact. This need not always involve more funding but finding ways to consolidate what is already available and then refining it would be a good start

When assessing the impact of pesticides in water, detection levels are just one part of the story. For example, Active A may be found in water at the same level as Active B but poses less risk as it is easily removed, for use say in drinking water, whereas B is high risk because it cannot be easily removed. There needs to be a more sophisticated analysis.

We support the catchment approach but would urge that amenity is brought into the partnership more strongly. They currently probably quite rightly are agriculturally focussed but the view from amenity is important if a true picture is to be achieved and full solutions developed. We would also urge water companies to involve themselves with amenity. Currently only two companies in England actively engage with the Forum. In Wales we have developed a partnership with Welsh Water and this is already producing results.

Question 24 – What are the priorities for research on the health impacts of pesticides?

As stated in your document, the Pesticides Users Health Study is well established. We would suggest that its impact might be greater if more communication of findings was made, and active and continuing dialogue with the Amenity sector would be helpful we feel to both sides.

We of course would not support any product which impacts on human health but, as often been said, the monitoring and approval of pesticides far outweighs that for many other everyday household products.

Question 25 – What suggestions do you have for ways of measuring our progress against the goals set out in this NAP?

The final version of this NAP needs to have measurable targets arising from the key objectives, well summarised in the Executive Summary. These then become the key measures of progress. Currently quite a lot of data is collected and reported on and the Pesticides Forum has been a good agent for helping with this. However connecting the data collected against the targets in the current NAP has not always been easy. Our general feeling is that there may be a need for less data collected but more meaningful and measurable data. We would be interested in discussing this further with you.

The Amenity Forum produces an annual report on its activities and this is modelled around reporting on progress against National Action Plan targets. In its circulation, we provide copies to Defra but would welcome an annual review meeting both as a monitoring process and to determine actions going forward. Last year we established such a meeting with the Scottish Minister and it proved highly effective and has led to positive actions. We are looking to something similar for Wales. The report is normally published in July each year.

Concluding Questions

Question 26 – How can we best bring together stakeholders with diverse interests to support delivery of the NAP, working towards a common goal of sustainable pest management?

The answer to this is that partnership is never easy but essential. It is absolutely vital that all governments and their agencies work closely with all in the sector in as united a way possible to deliver on the NAP. The Amenity Forum is the voluntary initiative for the amenity sector and indeed our key role is to work with all in our sector to promote best practice and deliver on objectives established in the current National Action Plan. In the ten years since our establishment, we can truly

say that we have brought all elements of our sector together and great progress has been made. We would welcome building on this and working closely with the UK and national governments in delivering the new NAP. And in this it is important to work across all departments because in the case of amenity management it extends beyond Defra including transport, leisure and more.

Already discussion takes place with a range of groups such as the Voluntary Initiative on how we can better deliver on common aims and objectives and importantly engage more with the public as a whole. Indeed recently we have established a process for regular review meetings with the Voluntary Initiative to focus on areas of common interest and where working together can produce even greater results. We believe working with groups in the sectors can produce the results sought. We would welcome a review of structures on how best this partnership working can better be communicated to all including policy makers and key stakeholders.

Question 27 – Considering the NAP as a whole, what other comments and suggestions would you like to make in addition to those covered by previous questions?

Language is important and we must say that in responding to this consultation and reading the document this has created challenge. For example the last question states ‘working towards a common goal of sustainable pest management. Surely the word pest here is wrong – we are aiming for sustainable, weed, pest and disease management? In the same way there are challenges in the term IPM as related to amenity. For a large proportion of our activity such as trains, highways, streets etc. the key target is weeds. That is why in our guidance on integrated we refer to Integrated Approaches to Weed, Pest and Disease Management – more long winded, maybe but more accurate?

There is also a danger in referring to future policy that the focus becomes all about not using pesticides and assuming any other method must be better. Yet we know the impact on health and environment might not always necessarily be less. Surely we need to be consistent in saying that we seek to minimise and target pesticide use in an integrated approach. Indeed pesticides often currently remain essential in any mix to achieve effective and efficient outcomes with less life cycle damage. In some cases such as for invasive weed control, pesticide use may be the only positive solution.

We do feel language in all of this is important. Our message is that we should all focus on managing weeds, pests and diseases to suit the particular needs of different amenity spaces making use of all available tools, and mixing them in the optimum way to achieve the right outcome in the most sustainable, economic and effective way.

Other Points

The Amenity Forum and the organisations that support it from all elements of this important and diverse sector strongly support the introduction of the Amenity Standard as a requirement. This will provide assurance to public and all that the work being undertaken to maintain amenity and sports surfaces is at a professional standard with an organisation committed to best practice.