A DRAFT NATIONAL STRATEGY FOR THE SUSTAINABLE USE OF PLANT PROTECTION PRODUCTS

Public Consultation Response From
The Royal Society for the Protection of Birds

SUMMARY

- The RSPB recommends that the Pesticide Safety Directorate (PSD) develops a comprehensive National Strategy for Pesticides, which should include a package of measures to reduce the impacts of pesticides.

- We believe that the Strategy must cover all sectors, all products and all uses, and should be titled 'A National Strategy for the Sustainable Use of Pesticides' rather than Plant Protection Products.

- The RSPB believes that the aim of the Strategy should be altered to reflect the need to minimise the negative impact of pesticides on health and the environment and ensure their sustainable use across all sectors.

- Government must provide clear leadership on pesticides, including clearly defined aims and targets, so that all stakeholders have a clear understanding of the strategic direction of the work. We believe the Strategy must set meaningful, time-bound and quantifiable objectives which undergo regular monitoring and assessment to ensure significant reductions in the negative impacts of pesticides on health and the environment are achieved.

INTRODUCTION

The RSPB is Europe’s largest wildlife charity with over one million members. We manage one of the largest conservation estates in the UK, covering c.110,000 hectares. Sixty of our reserves are farmed, covering more than 20,000 hectares, with around 170 tenant farmers, and 200 employees. We protect and enhance habitats such as lowland farmland, heather moorland, lowland heath, wet grassland, estuaries and reed beds, and our reserves help to protect 63 of the 77 most rare or threatened breeding birds in the UK.
The RSPB is the UK partner of BirdLife International, which is a global Partnership of non-governmental conservation organisations. BirdLife International strives to conserve birds, habitats and global biodiversity, working with people towards sustainability in the use of natural resources. The RSPB works closely with our BirdLife partners on EU agriculture policy issues.

The RSPB’s vision for agriculture is for sustainable systems of farming that produce adequate supplies of safe, healthy food; protect the natural resources of soil, air and water that farming depends on; help to protect and enhance wildlife and habitats; provide jobs in rural areas and contribute to a diverse rural economy.

The RSPB’s vision for water is that clean, reliable supplies are available to people and the environment through managing demand, reducing pollution at source, and using sustainable technologies.

The Royal Society for the Protection of Birds (RSPB) is represented on the steering group of the Voluntary Initiative and Pesticides Forum, has practical experience of pesticide use on our landholdings and undertakes research into the effects of pesticides on wild birds and their habitats. The RSPB recognises that issues such as human health are also important considerations in the development and implementation of pesticide policy although, clearly this is best addressed by others whose expertise is within this field.

The RSPB seeks a reduction in the impacts of pesticides on bird populations, other wildlife and the wider environment.

INITIAL COMMENTS

- The RSPB welcomes the release of the Draft Strategy for consultation, and hopes that the Strategy will now be developed and implemented rapidly, following the prolonged delay noted by Parliament’s Environment Food and Rural Affairs (EFRA) committee1.

A National Strategy for Pesticides

- The RSPB seeks a reduction in the impacts of pesticides because of the long-term risks they pose to birds, other wildlife and the places where they live.

- **We recommend that the Pesticide Safety Directorate (PSD) develops a comprehensive National Strategy for Pesticides, which should include a package of measures to reduce the impacts of pesticides.** This should consist of regulatory, fiscal, agri-environment, voluntary and other approaches. The Strategy should be introduced at the earliest possible opportunity with the Voluntary Initiative (VI) being seen within this context.

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1 Progress on the use of pesticides: the Voluntary Initiative, 2005, House of Commons Environment, Food and Rural Affairs Committee
• The RSPB believes that the Strategy must cover all sectors, all products and all uses.

• The RSPB believes that substituting the word ‘Pesticides’ for the term ‘Plant Protection Products’ is inappropriate for two reasons. Firstly, this gives the impression of flinching away from the negative connotations of pesticides, which we believe smacks of inappropriate spin. Secondly, in the Amenity sector and the Amateur User Sector, (inc. home and garden) these chemicals are not all used specifically to protect plants. **Therefore, we recommend that the Strategy should be titled ‘A National Strategy for the Sustainable Use of Pesticides’**.

• We believe the Strategy must set meaningful, time-bound and quantifiable objectives which undergo regular assessment to ensure significant reductions in the negative impacts on health and the environment are achieved. Objectives should set as ‘ends’ or outcome objectives rather than ‘means’ or process objectives.

The Draft Strategy Document

• The RSPB feels that the document does not go far enough to outline or achieve its aim as a Strategy. Although titled a Strategy the document is rather vague and unstrategic. The action plans list issues, desired outcomes and possible measures but do not propose timescales, costs or responsible parties. **The RSPB would like to see these included and the document worked up into a full strategy at the earliest opportunity.** We have made suggestions towards developing the Strategy further in this response.

Aim of the Strategy

• The RSPB believes that this strategy should provide the framework for **minimising pesticide impacts**. We are concerned that the Strategy and Aim are too focussed on ensuring the ongoing availability of pesticides for the sake of the agriculture industry rather than safeguarding against their harmful effects for the sake of the environment.

• We therefore recommend that the aim of the Strategy should be altered to read as follows:

  ‘**to achieve a progressive reduction in the negative impact of pesticides on health and the environment and ensure their sustainable use across all sectors.**’

This change is consistent with the Strategy’s long-term aim as outlined in section 2.5 of the Strategy document.

• For the same reasons we would like to see the four objectives, proposed in section 2.4, adapted to fit within this aim as follows:
  
  o Reducing the risks and negative impacts of Pesticides
  o Encouraging the development of alternative products and techniques
  o Promoting best practice in the use of pesticides
  o Safeguarding the interests of farmers, growers, other users of pesticides and consumers by securing safe food supplies and consumer choice.
• We propose that the objectives be altered, into the form above, as we believe that there should be no differentiation, within the Aim’s final sub-point, between the interests of farmers and consumers. Both parties are interested in securing safe food supplies and consumer choice.

ANSWERS TO SPECIFIC QUESTIONS

Question 1: Can you think of any existing or new targets or indicators (either environmental or activity based) that you would like to see included.

• The RSPB welcomes the Pesticides Safety Directorate’s (PSD) efforts, within the document, to assess the existing indicators for pesticides that will determine the effect that the strategy is having on their sustainable use.

• We agree that there need to be both Process and Outcome indicators within an evaluation framework but would like the Strategy to be clear that true evaluation of environmental impact must be based upon the assessment of Outcome Indicators.

• The RSPB would specifically like the strategy to include the following indicators:
  o The Terrestrial Wildlife Populations Trend Indicator should include population data for the Yellowhammer in addition to those for Grey Partridge and Corn Bunting. Yellowhammer populations have declined by 52%, between 1970 and 2001² and research has demonstrated a link between pesticide use and yellowhammer breeding performance³. This species has been included within the indicator used by the Pesticide Forum and has been adopted by the VI.
  o The RSPB would like to see the development of a Terrestrial Risk Indicator. An indicator for the risk of pesticides to the aquatic environment has been developed and is now included in the suite of indicators used by the Pesticides Forum. The RSPB believes that a Terrestrial Risk indicator would be valuable and recommends that this new indicator be developed within the scope of the Strategy.

• The RSPB would like to see further research into the indirect effects of pesticides on wildlife and biodiversity. Research would support the development of indicators that demonstrate the effects of pesticides on non-target species which act as food sources for other organisms. This further knowledge of the indirect effects of pesticides is also needed to inform the development of the pesticides approvals process to include indirect impacts, and the development of a potential financial instrument for reducing these effects. The RSPB recommends that new indicators be developed within the

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² The state of the UK’s birds, 2003, RSPB.
³ Indirect effects of pesticides on breeding yellowhammer (Emberiza citrinella), 2004, Antony J. Morrisa*, Jeremy D. Wilsonb*, Mark J. Whittinghamc* and Richard B. Bradburya
scope of the Strategy. In order to fully understand the indirect effects of pesticides further research is needed to understand the effects of:
  o Insecticides on arthropod food supplies;
  o Herbicides on non-crop plants which act as host for arthropods; and
  o Herbicides on weed species which provide green matter or seed food for birds⁴.

**Question 2:** What suggestions do you have for establishing better links between all the various parties with an interest in plant protection products?

- The RSPB welcomes the recognition in the Strategy document for the need to establish better links between all parties with an interest in plant protection products. However, the RSPB would like this broadened to cover all pesticides and not only those classed as plant protection products.

**Clarity of direction**

- The RSPB believes that the remit of PSD is too narrow to ensure that the aim of the Strategy is achieved in a sustainable way across all sectors. We would like to see PSD become the Pest Management Directorate with responsibility for ensuring and promoting sustainable pest management.

- Whilst there is no change to PSD’s remit **Government must provide clear leadership on pesticides, including clearly defined aims and targets, so that all stakeholders have a clear understanding of the strategic direction of the work.**

**Roles and responsibilities**

- Many organisations will be involved in implementing the National Strategy. A variety of organisations with specific areas of expertise; regional/country focus; policy focus; regulatory powers and/or existing partnerships will need to work together to achieve the aims of the Strategy. To facilitate this the Strategy should identify all organisations that will be involved in the implementation of the Strategy and their responsibilities in order to integrate their activities on pesticides, for example EA, FSA and PSD. Furthermore, this section of the Strategy should include organisations working on issues surrounding other chemicals or crossover issues where there is a link to pesticides and pesticide usage such as biocides, veterinary medicines, sheep dip, health and food standards.

- The proposed Action Plan for Water must develop links to Defra’s work on controlling diffuse pollution. Please refer to our recommendations as outlined in answer to Question 4 of the consultation.

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⁴ PN0925: Assessing the indirect effects of pesticides on birds, 2005, Defra
Stakeholder advice and monitoring

- The RSPB would like to see the Pesticide Forum taking a more active role in advising on and monitoring the implementation of the Strategy. The Pesticide Forum’s membership contains within it expertise in all areas of pesticides and is already in existence as a stakeholder forum. It is therefore in a prime position to offer valuable support in ensuring the implementation of the Strategy. In order to achieve this the Pesticide Forum should have its advisory role clarified in order to allow it to be effective in supporting the direction of Strategy implementation.

Question 3: List of measures: Accuracy and missing measures

- The RSPB would like to highlight one further environmental policy which must be included in the Strategy when prioritising and developing the Action Plans.
  - Government’s Public Service Agreement (PSA) target for England to reverse the decline in the ‘Farmland birds index’ (population trends of 20 species) by 2020.

Question 4: Comments on Outline Action Plans

- The Draft Strategy contains five basic Action Plans, including Water and Biodiversity. The RSPB recommends that the Strategy clearly explains the rationale for the five Action Plans and how they will be developed in the future. The RSPB recommends that the Action Plans be viewed and developed together. We consider that it would be unwise to divorce the Action plans from each other for individual development as beneficial links between each need to be exploited.
- The document does not include Research or Knowledge Transfer. The RSPB feels that these two areas are vital to the coherence and comprehensiveness of the Strategy and must be developed across all five Action Plans.
- The RSPB recognises the need to prioritise areas for action by the Strategy and understands that PSD is not able to place resources to target action on all problem areas. The RSPB believes that, on the whole, the priority action areas for the Strategy have been satisfactorily identified in the Action Plans. However, we would like to recommend a number of important changes.
- The five Action Plans listed below are in no specific order of priority although we would like to highlight the importance the Action Plans for Biodiversity and Water as the headline indicators within these must be environmental outcome indicators rather process indicators.
  - Action Plan for Biodiversity
  - Action Plan for Water

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- Action Plan for the Availability of Products and Techniques
- Action Plan for the Amenity and Amateur Use Sectors
- Action Plan for Targeted Impact Reduction

- When naming the Action Plans we recommend that the above form be used in order to avoid confusion with the formal Biodiversity Action Plan (BAP) process.
- The RSPB believes that the Action Plans require considerable development from PSD and must include indicators and targets. We have made comments below on what we believe should be the content of the Action Plans and have included further detail in the Appendix to this document, and would welcome the opportunity to provide further input during or following the consultation process.

**Action Plan for Biodiversity**

**Wildlife Poisoning Incidents**

- The Action Plan for Biodiversity must address the need for a reduction in the deliberate and illegal use of pesticides to poison wildlife. Despite the ongoing Campaign for Action against Illegal Poisoning and the Wildlife Incident Investigations Scheme (WIIS) there has not been any significant decrease in wildlife poisoning incidents in recent years\(^6\). This remains a serious conservation problem for a number of birds of prey, such as the hen harrier, as well as a risk to other wildlife and to people. We believe government needs to be more coordinated in enforcement work against poison abusers.
- Legislation exists in Scotland under the Nature Conservation (Scotland) Act 2004, as detailed in the table under 4.5 of the Draft Strategy. This Act introduced tighter controls on some widely abused pesticides in Scotland. The RSPB welcomes the inclusion of similar controls of pesticides in the Natural Environment and Rural Communities (NERC) Bill for England and Wales and would like the provisions of the Bill could go further to prohibit the possession of any pesticide without lawful excuse. In addition, there are a number of legislative problems in relation to the Food and Environment Protection Act 1985. We would like to see enforcement powers improved, such as bringing in a power of arrest.
- The RSPB recommends that the Strategy address the need for the introduction of these new powers and how they should be developed in order to reduce the number of wildlife poisoning incidents.
- The RSPB recommends that the Strategy include a target for a 50% reduction in cases of wildlife poisoning in the next 5 years. We believe that this is a challenging but realistic target.

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Pesticides Approvals Process

- At present, there is no provision within the framework of the pesticide approvals process to test for the indirect impacts of pesticides on wildlife. Pesticides are known to have an indirect negative impact on the populations of Grey Partridge, Corn Bunting and Yellowhammer species and may have an effect on other species.\(^7\)
- The RSPB recommends that PSD incorporates a requirement to assess the indirect effects of pesticides on wildlife populations within the regulatory process at the earliest opportunity.

Action Plan for Water

- Pesticides are one element of diffuse agricultural pollution from agriculture\(^8\). The development of this Strategy must expand upon how pesticide policy and its implementation, and especially voluntary approaches connect with and complement Catchment Sensitive Farming (CSF) delivery. The RSPB recommends that the Strategy details how PSD will coordinate with Defra sections presently working on CSF and how together they will put in place measures which will reduce the negative effects of all types of diffuse agricultural pollution. In England, Defra sections working on this issue and where crossover in work approaches occur include Water Quality Division and the new Nutrients Management Unit. Water Quality is working on economic instruments for the UK, regulation and on early delivery work in priority catchments. Devolved administrations also have ongoing work on tackling diffuse pollution in order to fulfil the needs of the Water Framework Directive. This bullet point is also in answer to the need for establishing better links in Question 2, of the consultation document.

Action Plan for Availability of Products and Techniques

- The RSPB recommends that the Plant Protection Products Availability Action Plan be re-titled as Action Plan for the Availability of Products and Techniques. This is because the desired outcome, as stated in the document, is that sufficient tools are available. This Action Plan should therefore include all methods of crop protection, including mechanical methods, crop rotations, alternative technologies and biological products, and not focus on or prioritise pesticides.

Action Plan for the Amenity and Amateur Use Sectors

- The RSPB believes that the Amenity and Amateur Use sectors are an important priority for work under the Strategy. The Voluntary Initiative has not been as successful in raising awareness of the impact of pesticides in these sectors as it has in the agriculture sector. Despite being small users of pesticide, when

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\(^7\) PN0925: Assessing the indirect effects of pesticides on birds, 2005, Defra
\(^8\) Developing measures to promote Catchment-Sensitive Farming, 2004, Defra – HM Treasury.
compared to agriculture, the amenity and amateur use sectors provide unique challenges and their use of pesticides may be disproportionate to the impact they have on the environment. Therefore, the RSPB recommends immediate action in these sectors and the provision of legislative powers to achieve the aim of the Strategy.

Action Plan for Targeted Impact Reduction

- The RSPB recommends that the title of the Targeted Use Reduction Action Plan be changed to Action Plan for Targeted Impact Reduction. The RSPB believes that the main focus of the Strategy should be on environmental impact reduction rather than use reduction policy per se. Use reduction should be viewed as a tool to reduce impact. Mechanisms for use reduction should aim to ensure future pesticide applications are based on economic thresholds of pests rather than prophylactic doses. This approach will not only reduce both use and negative impact but will lead to cost savings by avoiding excessive and wasteful pesticide use.

- The RSPB recommends that this Action Plan be used to develop a method for the reduction of pesticide impacts through a banded tax. The RSPB believes that financial instruments have an important role to play in achieving the aim of the Strategy and can deliver benefits that are unachievable through voluntary mechanisms. The RSPB recommends the introduction of a banded tax designed to include the indirect impacts of pesticides on biodiversity if the VI fails to produce genuine environmental improvements. This type of tax could bring about behavioural change by creating an incentive for farmers and growers to choose less harmful products. We believe that development work should be undertaken in any case as designing such an instrument would take time and it is important to ensure a viable tax model is ready if, and when required.

- The RSPB recommends that this Action Plan includes tools already developed and in use to help farmers reduce use and impact of pesticides such as: CPMPs; Agri-environment scheme options; BETA training and decision support tools.

- The RSPB believes that the Action Plan for Targeted Impact Reduction must investigate and expand upon how the impact of pesticides can be reduced through agri-environment scheme options. Both Entry Level Stewardship and Higher Level Stewardship contain options which, if put in place correctly can reduce run-off and/or diffuse pollution from agriculture. Schemes in England, Scotland, Wales and Northern Ireland have potentially large benefits in reducing pesticide export to water and providing compensatory habitats for biodiversity. The Strategy should reinforce the role of agri-environment schemes as the primary support mechanism for sustainable land-use.
Question 5: Other measures to be introduced to the Strategy and Voluntary Initiative measures.

Voluntary Initiative (VI) measures

- We believe that the VI has helped raise awareness of the impacts of pesticides on the environment; however, the RSPB is in agreement with the EFRA committee’s recent findings that the targets it has set are not sufficiently challenging.
- The RSPB would like to see many of the VI initiated projects continue, develop and support farmers following the scheduled end of the VI in March 2006. In order that the benefits of these VI projects are seen throughout the agriculture industry and the UK’s farmland the RSPB would like to see the following brought within Cross Compliance at the earliest opportunity:
  - Crop Protection Management Plans (CPMPs) or the completion of an environmental plan which includes the features of a CPMP.
  - The National Sprayer Testing Scheme (NSTS) and certification of new equipment. This annual certification of sprayers should come under cross compliance as this would ensure a high standard in all sprayers used. It would also incentivise the phasing out of infrequently used equipment, which is never officially tested, could reduce pesticides pollution incidents and the impact on water and the environment.
  - The National Register of Sprayer Operators (NRoSO). This national register should be brought under cross compliance so that only registered operators, undergoing continuous professional development, spray pesticides onto land.

New measures

- In this response we have highlighted those new measures that we believe will support the achievement of the aim of the Strategy in the Appendix. This should not be viewed as an exhaustive list.

Question 6: Comments on the document

- The RSPB feels that the Draft Strategy document is vague and unstrategic. We are disappointed that this consultation does not propose a more developed Strategy, especially with regard to the outcomes for the Action Plans.
- Despite this criticism the questions posed were clear and helpful in giving responses.
- The RSPB feels that the rationale for a Strategy is highly convincing.
- The linkages and relationships between all those involved with pesticides are not fully explained in the consultation document and the RSPB recommends that this

[9 Progress on the use of pesticides: the Voluntary Initiative, 2005, House of Commons Environment, Food and Rural Affairs Committee]
be a priority for PSD to address in completing the Strategy and listing those responsible for actions to implement the Strategy.

- The RSPB agrees that, on the whole, the priority action areas for the Strategy have been satisfactorily identified in the Action Plans. However, we have recommended important changes in our response.

RSPB June 05
APPENDIX: RSPB recommendation for Pesticide Strategy Action Plans?

The Action Plans below have been adapted from the Action Plans listed in the consultation document. These are not an exhaustive list of measures. The RSPB recommends…

Action Plan for Biodiversity

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<tr>
<th>Desired Outcome</th>
<th>Indicator</th>
<th>Possible measures</th>
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| Reduced direct and indirect effects of pesticides on non-target species, particularly with reference to BAP and other key species | Increase in population trends for grey partridge, yellowhammer and corn bunting | Tightening of approvals requirements;  
• by including the introduction of comparative risk assessment/substitution as part of the revision to Directive 91/414/EEC  
• by incorporating indirect effects into the regulatory process |
| Increased non-crop biodiversity | • Increase in target species reliant in non-crop habitats.  
• Increase in cereal field margins | • Promote uptake of agri-environment scheme options and best practice for maintenance of untreated field margins.  
• Develop low drift technologies. |
| Increased in-field biodiversity | • Increase in target species reliant on in-field habitats.  
• Increase uptake of in-field agri-environment measures | • Promotion of environmentally aware farming schemes and practices involving Integrated Farm Management (IFM) techniques  
• Crop protection management planning brought into cross compliance  
• Improve advisor awareness and training  
• Promote Agri-environment scheme options, e.g. skylark plots  
• Promotion of best practice  
• Mitigation requirements or use restrictions to reduce indirect effects (e.g. timing restrictions) brought into cross compliance or the approval process |
| Reduced misuse and abuse of pesticides to poison wildlife | • Reduction in poisoning incidents  
50% reduction in 5 years | • Enhance and promote WIIS campaign measures to combat abuse and misuse  
• Improve enforcement powers within legislation to tackle deliberate and illegal use of pesticides to poison wildlife  
• Tighter rules on possession of certain pesticides |
### Action Plan for Water

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<th>Possible measures</th>
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| Reduce water pollution from pesticides to attain compliance with the Water Framework Directive | • Reduction in pesticide levels in water  
• Reduction in water pollution incidents involving agricultural and non-agricultural pesticides  
• Reduction in the risk to aquatic life | • Restrictions or Environmental Quality Standards on priority substances  
• Catchment or regionally based requirements or restrictions on users. These might include product or timing restrictions or regional licences/permits  
• Targeted advice on products where usage patterns and ecotoxicological profile suggest a possible threat to aquatic life  
• Voluntary post-approval monitoring by approval holders  
• More rapid re-registration of pesticides where EU review raises concerns  
• Integration of VI river catchment stewardship scheme with other diffuse pollution catchment schemes.  
• Links with Whole Farm Approach and the Environment Agency’s Environmental Management Systems for Farming. |
| Reduced risk of pesticides entering water | • Reduction in pesticides entering field ditches. | • Training and certification of all sprayer operators brought into cross compliance - NRoSO  
• Sprayer testing brought into cross compliance - NSTS  
• Retrieval schemes for obsolete/withdrawn products  
• Encourage use of closed transfer systems/reusable  
• Promote good handling and filling – e.g. biobeds  
• Use of Decision Support Systems/Diagnostics - run monitoring programmes, e.g. weather stations, to forecast disease pressures |

### Action Plan for the Availability of Products and Techniques

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<th>Desired Outcome</th>
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<th>Possible measures</th>
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| Sufficient variety of tools available to protect agricultural and horticultural crops, and amenity and garden environments | • Reduction in pesticide use (using treatment frequency index)  
• Uptake of alternatives to chemical | • Introduce a regular regionalised use survey to fully understand product and technique usage in the UK.  
• Introduce fast-track registration system for biological pesticides and alternative technologies without compromising safety  
• Increase current statutory pesticide levy to fund such things as R&D into alternatives  
• Encourage applications to extend existing approvals (particularly for minor uses) by maximising |
pesticides | flexibility within regulatory data requirements  
| Review UK’s domestic system of ‘mutual recognition’ of approvals granted in other EU member states  
| Continue to support the essential uses programme and make use of EU powers for emergency authorisations  
| Promote and encourage development of pest disease-resistant crops  
| R&D on prevention and control of pests, weed control and decision support systems  

### Action Plan for the Amenity and Amateur Use Sectors

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<th>Desired outcomes</th>
<th>Indicators</th>
<th>Possible measures</th>
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| Strengthened understanding of pesticide use within the sector | • Collection and analysis of information from users, trade associations, local government bodies, enforcement bodies etc.  
| | • Introduce a regular usage survey for amenity use  
| | • Improved regulation of local authorities and contractors  
| | • New Code of Practice  
| | • Good practice guidance produced by Pesticides Forum and Amenity Forum  
| | • Disseminate best practice e.g. on purchasing, storage and use of pesticides in amenity situations  
| | • Revise the 1994 Department of Environment booklet "Guidance for control of weeds on non-agricultural land" which includes guidance on performance specification and contract management  
| | • Work to change public perception, e.g. reduce the pressure exerted on Local Authorities to produce and maintain a weed free environment.  
| Amenity users follow best practice with focus on particular uses, e.g. uses in local authorities | • Reduction in pesticide use in the amenity sector  
| | • Uptake of alternatives to pesticides  
| | • Inclusion of Strategy policies in organisation’s policies and management practices  
| | • Review and improve guidance and advice, - guidance booklet for amateur use  
| | • Publicity campaigns in the media encouraging good practice, e.g. safe use of pesticides in the garden  
| | • Work with retailers to promote good pesticide stewardship by consumers.  
| | • Improve availability of guidance on the contents of labelling of domestic and garden products  
| | • Promote alternative technologies for pest management for amateur use  
| Pesticides for amateur use sold, stored and used in accordance with regulations and guidance | • Increased awareness by amateur users  
| | • Review and improve guidance and advice, - guidance booklet for amateur use  
| | • Publicity campaigns in the media encouraging good practice, e.g. safe use of pesticides in the garden  
| | • Work with retailers to promote good pesticide stewardship by consumers.  
| | • Improve availability of guidance on the contents of labelling of domestic and garden products  
| | • Promote alternative technologies for pest management for amateur use  


### Action Plan for Targeted Impact Reduction

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<th>Desired Outcome</th>
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| Understanding of the scope for reducing adverse environmental impacts through targeted impact reduction | • Reduction in pesticide usage                                                | • Further investigate targeted use reduction plans already in operation in other EU member states  
• Consider the scope for reducing the use and impact of particular high risk pesticides on particular crops |
| Pesticides only used when actually necessary                                     | • Reduction in pesticide usage                                                | • Grower education for threshold rather than prophylactic treatments - support systems and advice  
• Promotion of environmentally aware farming schemes and practices involving Integrated Farming Management (IFM) techniques  
• Promote and facilitate technology transfer                                      |
| Reduction in chemical pesticide used                                            | • Reduction in total pesticide usage                                           | • Promotion of IFM techniques  
• Review dose rates for individual approvals/require publication of dose response curves  
• Local action, e.g. at catchment level, further use of water protection agreements in vulnerable zones (similar to those of Network Rail, Environment Agency and water companies) |
| More use of pesticides less harmful to health and the environment               | • Reduction in use of most harmful pesticides with correspondent move to less harmful products | • Design and assessment of a hypothecated banded Pesticides Tax to change behaviour and provide funds for voluntary schemes.  
• Development of biologically meaningful targets related to pesticide use          |