



From Professor John Moverley, OBE, Chairman, Amenity Forum, Edgeway House, Brook Lane,
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Rt. Hon Caroline Spelman MP
Secretary of State for
Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London
SW1P 3JR

21 March 2011

Dear Secretary of State

SOME CONCERNS ABOUT THE IMPLEMENTATION INTO LAW OF THE SUSTAINABLE USE DIRECTIVE

I am writing to you in my capacity as Chairman of the Amenity Forum. This is an independent body which brings together professional organisations with an involvement in the amenity horticulture sector. This is a very diverse industry responsible for the landscape management of urban areas, highways, sports grounds, parks, industrial, utility sites and the national railway network. To establish and maintain these areas to a high standard, the sector requires access to pesticides, efficient equipment and trained and qualified staff. The organisation was formed in October 2003 as a key action to support the Voluntary Initiative, an industry led project agreed with Government to reduce the environmental impact of pesticides. Some further information about the Forum and its objectives is attached as a separate sheet with this letter.

I am writing to you, further to a recent meeting of the Forum, to express serious concern about comments being made recently and emerging from discussions within Government departments. These relate to the implementation into law of the EU Sustainable Use Directive. The concern is that current controls on the use and distribution of pesticides may not be maintained but reduced. We fear that this will put back much that has been achieved and penalise those in the sector who have helped so much to improve standards and public safety. The existing certification scheme has been working successfully since the 1980s. We have been working very hard to strongly promote certification in our sector and support a voluntary assurance scheme. Any reduction in current controls would be a serious backward step.

We recognise the Government wish not to add to requirements in the Directive unless absolutely necessary but, if the current text of the European Directive was just transposed into UK law, we believe that the changes would undermine the status of current professional standards on user and adviser certification and training. It is in the latter area where our key concerns exist as the Forum has done much recently to improve standards and encourage wide scale use of continuing professional development and qualified staff. The wording of the Directive states that Member States would be required to *provide access* to training, rather than stating that all sprayer operators

and advisers must be trained and certificated by law. This is certainly not something we can support and we urge the UK government to make clear its commitment to current standards.

In considering the consultation on the changes last year, we had always believed that the Directive sought to reinforce controls on the use and distribution of pesticides, rather than weaken them. We urge the Government for a continuation of the UK's current statutory requirement for certification of sprayer operators and an extension of this requirement to all advisers, as well as provisions for ongoing training and professional development. Whilst application of the measures may be maintained through our membership by existing voluntary approaches, changes in legislative needs as we understand them would be a backwards step after the agricultural and horticultural sector has worked hard to set the very best standards. In amenity we recognise there remains much to be done and we do not want to see slippage in this area of requirement.

The Forum remains committed to promoting best practice in the distribution and use of pesticides and we feel that this must be underpinned by legislation to protect and enforce minimum standards. We would be pleased to work with the relevant members of the Government and civil servants in helping develop a more appropriate way forward. We wish to make these points in a very positive way and help find solutions.

Thank you very much for your attention

Yours Sincerely

John Moverley

PROFESSOR JOHN MOVERLEY OBE

Chairman of the Amenity Forum



THE AMENITY FORUM MEMBERSHIP & OBJECTIVES

The membership comprises of organisations from across this diverse industry, covering manufacturers, suppliers, trade associations, local authorities, major users, landscape, sport and leisure. Equally important are those members who represent training and qualification standards. The key Government agencies have an important observer role. The objectives of the Amenity Forum are:

- To establish the Amenity Forum as the collective body representing the amenity industry, in relation to pesticide use
- To lead, coordinate and encourage achievement of "Best Practice" objectives in amenity pesticide use
- To coordinate and encourage the establishment of sustainable qualifications, training and CPD activity, specifically for the amenity sector
- To organise activities within the Amenity Forum membership and linked organisations, such that Amenity Forum objectives are developed in a coordinated way