

19 February 2021

For the Attention of Defra Pesticides Team

IFST Response to Defra Consultation on the Sustainable Use of Pesticides: Draft National Action Plan

The Institute of Food Science & Technology (IFST) is the leading qualifying body for food professionals in Europe and the only professional body in the UK concerned with all aspects of food science and technology. Our membership comprises individuals from a wide range of backgrounds, from students to experts, working across all aspects of food science and technology, and from academia through to enforcement. It is a registered charity (no 1121681) and a company limited by guarantee (no 930776).

IFST would like to thank Defra for consulting on the important topic of sustainable use of pesticides.

We have considered the proposed National Action Plan consultation and fully support the need for integrated crop management to prevent adverse impacts on public health and the environment. We would like to stress the importance of ensuring careful consideration is given to unintended consequences which can occur if a fully integrated approach is not applied to safety and use assessments and to on-going re-assessments. In particular, we would ask that a mechanism to address consequences upon safety and regulatory compliance going forward where individual substances are used for a variety of different functional purposes, for example as a biocide and a plant protection product.

All food system technical professionals should be technically competent commensurate with their role and responsibilities. Pesticides advisors play an important role in ensuring the safe and appropriate use of plant protection products and thus would be expected to be suitably qualified and competent to provide sensible technically relevant advice and undergo continuous professional development to maintain their competence.

We would appreciate being informed of the consultation outcomes, and of future consultations.

Many thanks and Kind regards

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