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Brexit Predicted to Lead to Regulatory Decline and Increased Hazards from Pesticides

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The potential exit of the United Kingdom from the European Union (EU) — aka "Brexit" — may portend greater pesticide use and exposures, according to a report from the Soil Association and the Pesticide Action Network UK. As covered by The Guardian, the report's prediction points to uncertainty, despite reassurances from the United Kingdom (UK) government, about what regulatory standards will actually be in effect if and when Brexit occurs. The report also highlights the under-regulated issue identified in the report's title — The Cocktail Effect — synergistic impacts of exposures to multiple synthetic pesticide compounds. Beyond cessation of pesticide use, Beyond Pesticides advocates for more rigorous review of synergistic effects of pesticides in the U.S.

In the UK, environmental and health advocates are voicing worries that the government's reassurances that existing standards will be maintained after a Brexit is unconvincing. UK Environment Secretary Michael Gove insists that environmental standards would be enhanced following a UK exit from the EU. But advocates are concerned about potential loopholes that could allow farmers to use more pesticides on crops than the EU regulations permit, and could greenlight the import of foodstuffs with greater amounts of pesticide residue than current EU regulations allow.

Advocates also point to a report from the multi-partisan Environmental Audit Committee (of Members of Parliament, or MPs) that warns that a draft Environment Bill proposed for the post-Brexit period is alarmingly lacking in purported "protections." That report says, "The environmental principles which guide and inform EU legislation and policy have been severely downgraded by the proposals in the bill. They are [also] subject to a number of exclusions and to the veto of the secretary of state."

Further, advocates note the marked increase in pesticide use in the UK during the past 30 years or so. *The Cocktail Effect* provides a "status report" on pesticide use in the UK. It asserts that treated acreage (calculated as treated area multiplied by number of applications) has increased by nearly two-thirds in that period. This has been true especially of herbicide and fungicide application. In addition, frequency of use has risen: whereas 1990 saw 30% of grain crops and 21% of oilseed rape treated more than four times in a growing season, by 2016 those metrics rose to 55% of grains and 80% of rape; potatoes, e.g., are subject to three times the number of applications they underwent in 1990. Further, the report contends that the toxicity of currently deployed pesticides is higher than that of previous generations of compounds. It cites the examples of deltamethrin, used in many crops, as 360 times more toxic than the infamous DDT, and some neonicotinoids as 10,000 times more toxic than DDT.

The Cocktail Effect drills down on the issues related to exposures to multiple pesticide compounds — pesticide "cocktails." It cites various metrics, including:
• more than 1/3 of all the fruit and vegetables tested by the UK government in 2017 and 2018 contained residues of more than one pesticide

- 87.5% of the pears tested in 2017 contained pesticide cocktails, with 4% containing residues of nine or more different chemicals
- a single sample of raspberries contained a known carcinogen, a probable carcinogen, 2 possible carcinogens, 2 endocrine disruptors, a developmental toxin, and a neurotoxin
- multiple residues were found in more than 3/4 of grapes tested in 2018
- in 2017 and 2018, 1/4 of all food items tested by the government contained multiple pesticide residues

The report notes that there is currently no governmental monitoring of exposures to such cocktails in the environment, despite a finding, in a soil study across 11 European countries, that the UK samples yielded the second-highest variety of residues. Approximately 67% of the UK samples had multiple residues, 25% had more than six, and 4% harbored traces of more than 10 pesticides. A cited study of UK waters (rivers, lakes, ponds, et al.) demonstrated, for example, that 66% of samples taken from seven riverine habitats contained residues of more than 10 pesticides.

As Beyond Pesticides has done many times, *The Cocktail Effect* identifies the growing evidence that exposure to multiple pesticide compounds can result in synergistic effects. Yet the UK government continues to assess the safety of one chemical at a time. This approach not only ignores the potential risks to human health from consumption of a single food (e.g., berries with multiple pesticide residues), but also, the risks related to the variety of foods consumed in the course of a day or week or month. In addition, it fails to recognize the increased use of multi-pesticide products, a "doubling down" approach adopted by industry in the face of failing efficacy of single-active-ingredient pesticides as organisms (weeds or animal pests) develop resistance to the compounds. Last, the report maintains that the UK regulatory system is poorly equipped to protect the natural environment from pesticide cocktails; it "ignores the cocktail effect, and fails to assess, monitor or limit the sum total of pesticide residues to which the environment and wildlife are exposed."

Among the report's key recommendations are:

- ensure that there is no weakening of UK pesticide regulations or standards if and when Brexit occurs
- undertake initiatives to support UK farmers in the transition to "whole farm agroecological systems" — such as organic and agroforestry
- establish quantitative targets for significant reduction of the overall use of pesticides in agriculture
- enact robust monitoring of pesticide impacts on environmental and human health
- undertake government-funded research into the effects of pesticide cocktails on the natural environment, wildlife, and human health
- ban public entities from applying pesticides near schools, playgrounds, and residential areas, and phase out all non-agricultural uses of pesticides

The Cocktail Effect summarizes: "Until the government takes action, farmers will struggle to get off the 'pesticide treadmill,' and UK citizens and our natural environment will continue to be exposed to potential harm. It is time to bring this damaging, decades-long experiment — in which we are blindly exposed to pesticide cocktails without any sense of the true consequences — to an end."

"Green" advocacy groups in the UK are exhorting government ministers to use Brexit as an opportunity to "create the world's most transparent regulatory system for pesticides . . . building public trust that decisions are the result of an unbiased process." The head of campaigns and policy at Pesticide Action Network UK, Josie Cohen, said, "The UK will either need to create new institutions and bodies that can fill the governance gap after Brexit, or at least ensure that there are systems and staff in place to fulfil the functions previously carried out by EU bodies. The government urgently needs to invest in ensuring that, post-transition period, the UK system is fit for purpose. Otherwise, it risks a major weakening of UK pesticides standards, which would enable a greater variety of hazardous pesticides to be used in larger quantities." *The Guardian*article notes advocates' claim that trade discussions, negotiations, or deals with the U.S. would result in pressure on the UK to lower its pesticides standard to comport more closely with those in the U.S. — on whose inadequacy Beyond Pesticides has worked for decades.

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Sources

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https://www.soilassociation.org/media/19535/the-pesticide-cocktail-effect.pdf

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