



Public Health and the Environment

A DANGEROUS EUROHAZARD

Roger Bate

The EU's new regulations on pesticide use are designed to protect public health. But they could end up harming it instead. The EU is considering legislation that it hopes will help reduce pesticide levels in foods. By changing the way it assesses the potential health and environmental impacts of pesticides – moving to a hazard-based assessment based solely on chemical toxicity rather than the context in which the chemical is used – the legislation is likely to reduce the number of pesticides on the market, as well as how frequently they are used.

The legislation has been billed as a necessary and long overdue public-health reform. And while many of the substances targeted can cause cancer or mutations, when consumed in sufficiently high quantities and over an extended period of time, Europeans are not at risk from pesticide poisoning. The unintended consequences of this legislation will easily outweigh any public-health benefit. Quantifying its precise impact is impossible, hobbled by the legislation's ambiguous language and subsequent uncertainty about which chemicals it would actually ban. More importantly there is no rigorous, science-based assessment weighing the regulation's anticipated benefits against its inevitable costs.

In declining to sign a draft version of the legislation in late June, the UK government expressed concern that 'no proper assessment on the potential impact of these proposals on agriculture in the European Union, or of their benefits for customers, [had] been made available'. 'Without such an assessment,' the statement continued, the EU would risk taking measures that would have 'significant adverse impacts on crop protection but secure no significant health benefits for consumers'.

If the eliminated substances were among the most dangerous and least useful, then few stakeholders would suffer. But because crop producers must often rely on a cocktail of substances and strategies to control pests, fewer chemicals would inevitably make managing resistance more difficult, forcing growers to rely on less successful control techniques. This would create significant crop losses.

Industry says that up to 30% of agro-chemicals will be lost. According to the Italian research institute Nomisma, by 2020 the proposed regulation could cause yield losses of

29%, 33% and 20% for wheat, potatoes and cereals, respectively. According to the British environmental and rural consultancy ADAS, 'even the lowest-impact proposals would reduce food production by a quarter'.

Unlike earlier drafts, the newest version of the legislation at least includes a provision that allows member states to apply to the Community to override the regulation, 'where it is necessary to do so because of a danger or threat to plant production which cannot be contained by any other means'. Still, the time and effort needed to secure an exception – involving up to two years of consultation – may render it meaningless. Meanwhile, plummeting crop yields would cause food prices to rise.

For Africa, which exports large quantities of agricultural foodstuffs to the EU, this could be especially disastrous. The EU is the most important trading partner and largest export market for nearly every country in Africa. EU importers, forced to reckon with the new legislation, are likely to abandon smaller and less well-organised African export industries, since they will be less able to provide appropriate pest management training to growers or set up robust traceability systems, which will be required. African exporters desperate to keep EU markets would probably also abandon small-scale growers, which would inevitably eliminate jobs in horticulture, a sector especially important for women in Uganda and some Southern African countries.

Yet the most insidious impact of the legislation could be on public health. African countries may simply switch to organic farming and stop using even insecticides currently used for public health purposes. After all, Ugandan farmers have consistently lobbied against the reintroduction of the insecticide DDT for malaria control due to concerns about contamination of their crops destined for export.

Policy-makers in the EU should scrap this legislation, or at the very least commission an independent scientific and economic assessment of the costs and benefits of the proposed legislation before moving forward.

Roger Bate is a Resident Fellow of the American Enterprise Institute (rbate@aei.org).