

PREM 19/3028

Confidential filing.

The Campaign against, and the use of, chemical herbicides, especially 2-4-5T.

HOME AFFAIRS.

June 1980.

Referred to	Date	Referred to	Date	Referred to	Date	Referred to	Date
11-6-80.							
11.12.80							
16.12.80							
23.12.80							
8-6-80							
26.6.84							
2.4.90							

PREM 19/3028

TO BE RETAINED AS TOP ENCLOSURE

Cabinet / Cabinet Committee Documents

Reference	Date
CC(80) 23rd Meeting, item 4 (extract)	11/06/1980

The documents listed above, which were enclosed on this file, have been removed and destroyed. Such documents are the responsibility of the Cabinet Office. When released they are available in the appropriate CAB (CABINET OFFICE) CLASSES

Signed *J. Gray* Date 20/2/2016
PREM Records Team



file ✓

10 DOWNING STREET

LONDON SW1A 2AA

From the Private Secretary

3 April 1990

Dear Andy

PESTICIDE POLICY

This is just to confirm, following our conversation this morning, that the Prime Minister accepts that your Minister should make a statement on pesticides policy. She hopes that it will be amended to sound a bit less like a bureaucrats' charter than the earlier draft! You discussed subsequently with me the changes which your Minister had in mind to reflect that concern.

I am copying this letter to Tim Sutton (Lord President's Office), Roger Bright (Department of the Environment), Gillian Kirton (Lord Privy Seal's Office), Colin Walters (Home Office), Clive Norris (Department of Employment), Helen Shirley-Quirk (Department of Health), Murdo Maclean (Chief Whip's Office), Douglas Slater (Government Whips' Office, House of Lords), Stephen Leach (Northern Ireland Office), Tim Gallagher (Scottish Office), Stephen Williams (Welsh Office) and Sonia Phippard (Cabinet Office).

Yours sincerely

Dominic Morris

Andy Lebrecht Esq
Ministry of Agriculture, Fisheries and Food.

PRIME MINISTER

PESTICIDE POLICY

You expressed serious reservations about MAFF'S draft statement (Flag A) on the increase of resources devoted to agricultural pesticides. The attached letter from Mr. Gummer's office seeks to clarify some of the points about which you were most concerned. They make four main points:-

- the industry itself is pressing for more resources to deal with the backlog in pesticide approvals and are "fully prepared" to bear the additional costs of improved regulations and to fund additional resources. *What about the Dunder Co's?*
- the manpower and pay scale figures were agreed with the Treasury as part of the last public expenditure round. The pay scales were in fact introduced last summer, and MAFF have so far at least been able to ring-fence those within the Department.
- the proposed accommodation at Harpenden brings together the staff of three existing sites where accommodation is a combination of Victorian buildings and portakabins. The £1 million figure is for MAFF'S total IT bill rather than being related to the cost of the accommodation (which will cost about £250,000).
- with the exception of the new accommodation, the rest will not be unexpected to the industry, and has in fact been brought together in a statement simply to pre-empt the Opposition attack due on Wednesday on the failure to review the status of the 250 older pesticides approved before 1981.

On the basis of MAFF's further explanation, content for them to issue the statement in response to a Written PQ tomorrow?

DM

2 April 1990

jd c:pesticide

I hope they will make it sound rather less of a business

As a whole the unit does now ~~not~~ not



Ministry of Agriculture, Fisheries and Food
Whitehall Place, London SW1A 2HH

From the Minister

Dominic Morris Esq
Private Secretary
10 Downing Street
London SW1

2 April 1990

Dear Dominic

PESTICIDE POLICY

Thank you for your letter of today's ~~date~~, which my Minister has carefully considered.

It may be helpful if I explain something of the background to our proposed statement on pesticides and the reasons why it needs to be made now. The Ministry's Pesticides Safety Division currently faces a three-year backlog in dealing with requests for the approval of new pesticides. This has caused major problems for the agrochemicals industry, who have typically spent £10-20 million on the research and development of each of their new products. We are therefore under strong pressure from the industry itself to speed up our approvals process. Indeed, the British Agrochemicals Association is on record as saying that it is fully prepared to bear the additional costs of improved regulation and to fund additional resources in this important area. It has also already agreed to the principle of higher fees in return for a better service.

We are also under strong consumer and environmental pressure to review the status of the 250 or so older pesticides approved prior to 1981. The Opposition are we know ready to launch a major attack on the Government for having failed to make any significant progress in this area. But work on the review cannot be speeded up without substantial new resources.

I now turn to the points raised in your letter. On the first of these (increases in manpower), the manpower figures included in our draft statement were explicitly agreed with the Treasury in

the last public expenditure survey (the magnitude of the increase in staff appears to be greater than it is, owing to our repeated failure to fill posts approved over the last two years). On pay, the new scales were introduced with Treasury agreement last August to enable us to deal with the serious staff recruitment and retention problem which we had encountered in the Data Evaluation Unit. Our experience to date shows that these new scales are proving to be effective. We have stood firm against extending them more broadly within the Department.

The reason why we need better accommodation is simply that the present facilities are quite inadequate. They are a combination of broken down Victorian buildings and portakabins, spread over three sites, with insufficient space even for the present staff. The £1 million figure mentioned in the draft statement relates not to accommodation but to the cost of the new IT system, which is part of the Department's IT strategy (also agreed with the Treasury).

The draft statement does not therefore contain any reference to resources not already included in plans agreed with the Treasury. Our aim in making the statement is to set out in clear and comprehensive terms the decisions we have already taken, in consultation with other Departments and the industry, to deal with the problems we face arising from the backlogs in the approval of new pesticides and the review of older products. I hope therefore that in the light of this explanation the Prime Minister will agree to my Minister making a statement tomorrow, along the lines proposed, in order to pre-empt the Opposition's own pesticides initiative planned for 4 April.

I am copying this letter to recipients of yours.

Yours sincerely

Andy

A J Lebrecht
Principal Private Secretary

HOME AFFAIRS : Pesticides
Jun 80





file

10 DOWNING STREET

From the Private Secretary

2 April 1990

Dear Andy

Pesticide Policy

Ray Alderton wrote to me on Friday with a draft of a statement your Minister hoped to make today. As you know there can not in any case be an oral statement because of the two statements the Home Secretary will be making this afternoon. Nor should it go as a written statement because the Prime Minister has serious reservations about the policy content of it. She thinks that it will cause excessive bureaucracy and will involve considerable increases in manpower and expense. She has commented in particular that the increases in resources needed for the MAFF Evaluation Unit and the special pay scales will have repercussions elsewhere and would need to be considered further. She is also particularly concerned about the new accommodation at Harpenden which in her view seems unnecessarily expensive. A substantial rise in fees to reflect the changes proposed would also cause significant opposition. In brief a fundamental rethink of these proposals is necessary before any public statement can be made.

Copies of this letter go to Tim Sutton (Lord President's Office), Roger Bright (Environment), Gillian Kirton (Lord Privy Seal's Office), Colin Walters (Home Office), Clive Norris (Employment), Helen Shirley-Quirk (Health), Murdo MacLean (Chief Whip's Office), Douglas Slater (Lords' Whips), Stephen Leach (Northern Ireland), Jim Gallagher (Scotland), Stephen Williams (Wales) and Sonia Phippard (Cabinet Office).

Tim Sutton
Dominic

DOMINIC MORRIS

A J Lebrecht Esq



There will be another very important statement on Monday for the Home Office.

Ministry of Agriculture, Fisheries and Food

Whitehall Place, (West Block), London SW1A 2HH

Tel: 01-270-3000 Direct line: 01-270-8509 GTN: 270

Telex: 889351 Fax: 01-270-8125

another look at this programme

Prime Minister

Policy in Confidence

Dominic Morris Esq
Prime Minister's Office
10 Downing Street
London SW1

Content for the minutes

to make this statement

on Monday 30 March 1990

PESTICIDE POLICY

My Minister hopes to make a statement to the House of Commons on Monday 2 April announcing an increase in resources devoted to regulating agricultural pesticides. The statement would refer to contracting out some of the work, to making the advice of the Advisory Committee on Pesticides available for public scrutiny, to deciding that all future approvals will be time limited and to an increase in residue monitoring.

This package of measures should reduce to a considerable extent the impact of an expected Opposition Campaign on pesticide safety, due to begin on Wednesday 4 April.

A copy of the draft statement is enclosed and I should be grateful to receive any comments by 11.00am on Monday 2 April.

A copy of this letter and enclosure goes to Bernard Ingham (No. 10), Tim Sutton (Lord President's Office), Roger Bright (Environment), Gillian Kirton (Lord Privy Seal's Office), Colin Walters (Home Office), Clive Norris (Employment), Helen Shirley-Quirke (Health), Murdo MacLean (Chief Whip's Office), Douglas Slater (Lords' Whips), Stephen Leach (Northern Ireland), Jim Gallacher (Scotland), Stephen Williams (Wales) and Sonia Phippard (Cabinet Office).

Yours sincerely,
Ray Alderton

R L ALDERTON
PARLIAMENTARY CLERK

- cc Private Offices
- Mr Capstick
- Mr Murphy
- Mr Hollis
- Mr Dugdale



REVISED
30 MARCH 1990

DRAFT ORAL STATEMENT

I attach great importance to ensuring that approved pesticides are safe and that they are safely used. My colleagues and I have therefore reviewed the resources devoted to regulating agricultural pesticides and monitoring their residues.

*Food + Environmental
Protection Act 1985*

The introduction of statutory controls on pesticides under FEPA has led to a significant increase in the volume of work in MAFF's and HSE's Evaluation Units. Although the waiting time for applications to extend uses of approved products has been halved over the past year, two key tasks remain: to review to current standards those products approved some time ago, and to speed up the consideration of applications for new pesticides.

To meet these challenges my colleagues and I are providing for further substantial increases in the resources available for evaluation. Within the MAFF Evaluation Unit the numbers of scientific staff in post have risen from 25 in April 1986 to 54 currently. In the coming twelve months we shall increase these by a further 60%, to 86. The recruitment of the new staff is already under way. And we have introduced special pay scales to recruit and retain the specialised scientific staff required.

*This will cause
major changes*

The physical resources available to the Unit are also being enhanced. New accommodation is being acquired, which will bring the Unit together on a single site, at the AFRC's Harpenden complex. This will be the first MAFF office to be equipped in 1991 with computerised office systems, costing about £1m, to enhance efficiency.

In addition to recruiting extra scientists, we are planning to contract out discrete blocks of work in order to increase throughput. Several independent laboratories have been

*Sounds
unrealistic
expensive*

approached and specimen contracts will be issued shortly as a pilot exercise. The contract work will of course be subject to close monitoring for quality assurance. The internal resources saved will be switched to the highly-demanding emergency reviews.

Because of the high standards of safety which we apply, and the complexity of modern regulatory work, the training of the new staff will be given high priority. Although this will absorb significant resources we nevertheless aim to increase threefold the capacity to process new pesticides, from 8 in 1990/91, to 12 in 1991/92, 20 in 1992/3, and 25 per year thereafter. This is a realistic plan and these targets are stretching but achievable.

Similarly the number of reviews of older pesticides, full and partial, will rise from 12 in 1990/91 to 29 in 1991/92, and 37 in 1992/3. The total number of pesticides registered in the UK before 1981 is over 250 and all these will be reviewed, subject to a priority ranking exercise which is being established, with the advice of the ACP. For agricultural pesticides, we intend this work to form part of a co-ordinated 10-year European Community programme for the review of older pesticides. Indeed, what we have proposed will more than match our likely share of the Community programme. We always of course check as a matter of urgency any approved pesticides against which doubts have been cast. On non-agricultural pesticides the UK Government has taken the lead in pressing the EC for a harmonised approach similar to that proposed for agricultural pesticides.

We have already approached all approval holders to alert them to the review programme and to ask whether or not they hold data packages for their products which are capable of meeting modern standards. Those who have not replied will shortly have their approvals withdrawn.

To ensure that such a large review programme does not recur we have decided that in future all approvals will be time-limited,

so that regular reviews will be required automatically if re-approval is sought.

Inevitably the increase in resources will give rise to an increase in fees for the approval of a new active ingredient. The increase from £7,000 to £30,000 has taken effect from yesterday.

A key element in maintaining public confidence in the safety of approved pesticides is the advice from the Advisory Committee on Pesticides which is impartial and of the highest level of expertise. My colleagues and I have decided that all evaluations prepared by the Committee and the data underlying them will be made available for public scrutiny in as open a way as anywhere in the world.

Although our data indicates that our food generally contains very low levels of pesticide residues I have been examining how we might obtain further reassurance on the safety of our food. The Government already carries out an extensive programme of testing food, feedingstuffs, human tissues and wildlife, costing £1.5 million per year. We have approached representatives of food manufacturers, retailers, and local authorities who also perform a significant number of tests and they have in principle agreed to make their results available to the Government. This will greatly enlarge the data available on residues. For example, we know already that the number of samples of wheat available to us will be multiplied at least ten times.

In relation to non-agricultural pesticides there is also a good story to tell. My colleagues in the Department of Employment are increasing the number of scientists in the HSE. Since April 1987 the numbers have increased from 6.6 to 18.5. This will further increase to 25.5 on 2 April 1990, and it is intended to reach the complement of 31.5 by April 1991. However, as with MAFF, this will require that the training of staff is given a high priority

and there is no significant loss of staff to outside organisations.

Thus it is envisaged that by 1994 evaluation work of new active ingredients will start immediately an application for approval is received.

HSE plans to have completed its review programme of older pesticides within the next 10 years. Reviews have already been initiated on a number of active ingredients on which there has been public concern, and a review programme drawn up for the rest.

Mr Speaker this is a bold and radical initiative.

Through increased staff numbers and some contracting out we will drastically increase approvals throughput.

The review of old pesticides will be speeded up and old registrations cancelled.

We will adopt the latest information technology and increase monitoring of our food supply.

And, of prime importance, full data will be made available for public scrutiny.

I hope the House will agree that with this carefully worked out package of measures. We have laid out a realistic plan which will meet the needs of manufacturers, users, and consumers and I commend it to the House.

June 26, 1984

For issue at 6pm

sub
24/6

CONSULTATION ON PESTICIDES SAFETY LEGISLATION

The Ministry of Agriculture, Fisheries and Food is currently circulating for comment a consultation document on proposed legislation for the safe and efficient use of pesticides. The decision to introduce legislation was announced by the Rt Hon Michael Jopling, MP, Minister of Agriculture, Fisheries and Food, on May 10, 1984.

The document outlines the aim of the legislation, and the powers which Ministers wish to take to regulate the approval of pesticides, their distribution and their use. It introduces the concept of charging to cover the cost of approving pesticides, and proposes the conditions to be satisfied before approval can be granted.

The document is being sent to a wide range of organisations in Great Britain and Northern Ireland, and the closing date for written observations is July 30, 1984. Additional copies of the document can be obtained from Mrs Heather Hamilton, Room 683, Ministry of Agriculture, Fisheries and Food, Great Westminster House, Horseferry Road, London SW1P 2AE, to whom observations on the proposals should also be sent.

Commenting on the reasons for introducing legislation, Mrs Peggy Fenner, MP, Parliamentary Secretary, Ministry of Agriculture, Fisheries and Food, said:

"In the first place, the Government is looking increasingly hard at all environmental questions, and in doing so is directly reflecting the concern felt by people that we may not be doing enough to protect the environment we live in. In this case, we have very painstaking and detailed arrangements for controlling the use of pesticides, but they are non-statutory and therefore depend on goodwill for their effectiveness. They have come under increasing pressure in recent years. These pressures have come from two sources: firstly, from the import of cheap uncleared pesticides, particularly when currency fluctuations have made Continental prices attractive; and second, from the European Commission who have criticised the competition implications of the trade agreements which support the Pesticides Safety Precautions Scheme."

NOTE FOR EDITORS

The proposal to introduce legislation to ensure the safe and efficient use of pesticides was announced on May 10, 1984 (Press Notice No 162 refers).

M

Pesticides .



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To be inserted

wh w/s

Ministry of Agriculture, Fisheries and Food
Whitehall Place London SW1A 2HH
Home Affairs

Prime Minister
This includes 245 T.

MP 10/11

8 May 1982

From the Minister's Private Office

Peter Shaw Esq
Private Secretary to the Secretary
of State for Education and Science
Elizabeth House
York Road
LONDON
SE1 7PH

mf.

Dear Peter

... I enclose, for information, a copy of a letter which my Minister has sent to Professor Kilpatrick, the Chairman of the Advisory Committee on Pesticides. Mr Walker has requested that this should be specially drawn to the attention of your Secretary of State, in view of the sensitivity of the subject. The Committee's response will be circulated in due course.

I have copied this letter, and the enclosure, to the Private Secretaries to the Prime Minister, and the Secretaries of State for the Environment, Industry, Social Services, Employment, Northern Ireland, Scotland and Wales.

Yours sincerely
Robert Lawson

ROBERT LAWSON
Private Secretary



MINISTRY OF AGRICULTURE, FISHERIES AND FOOD
WHITEHALL PLACE, LONDON S.W.1

From the Minister

Professor R Kilpatrick CRE
University of Leicester
Medical Sciences Building
University Road
LEICESTER
LE1 7RH

8 May 1982

Handwritten signature/initials

malignant tumours (cancers) of bone, cartilage, & smooth muscle

29-245 T (Dioxin)

My attention has been drawn to an article in the latest issue of the Lancet by Dr Coggon and Professor Acheson which concludes that "there is evidence of a biological association between phenoxy herbicides (or their contaminants) and soft-tissue sarcomas".

Doubtless you and your colleagues on the Advisory Committee on Pesticides, as the competent advisory body to the Government in this case, will be considering the article in accordance with your normal practice. I should be most grateful if you could let me have your Committee's observations at an early date, and if in doing so you would cover also any other new evidence that has become available on these pesticides since the Committee last reported on them.

I have sent a copy of this request to the Secretary of State for Education and Science and to my other colleagues concerned.

Handwritten signature of Peter Walker

PETER WALKER

Home Affairs. ²2 MARSHAM STREET
LONDON SW1P 3EB

My ref: H/PSO/19537/80

Your ref:

23 December 1980

Prime MinisterMPD
29/xx

De Peter

You copied to me your letter of 11 December to Patrick Jenkin about the report on 2,4,5-T by the Advisory Committee on Pesticides.

As you know I have now had a letter from Sir Hans Kornberg saying that the Royal Commission on Environmental Pollution regard the Advisory Committee's report as a thorough analysis of knowledge relating to the safety of 2,4,5-T; and that it provides reassuring further evidence on its safety and (through the data on the Seveso incident) on the absence of teratogenic effects from any dioxin impurity.

In view of the reassurances provided by the Advisory Committee, and supported by the Royal Commission, I agree that we should accept the Advisory Committee's central conclusion that the use of 2,4,5-T herbicides in accordance with the recommended precautions can safely continue. I am content with the general lines of your proposed Answer in the House but would like your officials to keep mine informed of the precise terms of the announcement.

I note that the Royal Commission welcome the inclusion of the case studies in the Advisory Committee's report because they demonstrate convincingly that the allegations of injuries to health caused by 2,4,5-T lack substance. I share their view.

The Royal Commission's letter is also pertinent to our consideration of their Seventh Report. In their view the Advisory Committee's report gives added support to their conclusions about maintaining the present system of control and on the need for greater professionalism in pesticide application. We shall need to bear this in mind in considering our response to the Seventh Report.

I am copying this letter to the Prime Minister, Keith Joseph, Jim Prior, George Younger, Nicholas Edwards, Humphrey Atkins, Patrick Jenkin and Mark Carlisle.

has ev

MICHAEL HESELTINE

The Rt Hon Peter Walker MBE MP



FROM THE MINISTER OF STATE

SCOTTISH OFFICE
WHITEHALL, LONDON SW1A 2AU

Home Affairs
VMS

The Rt Hon Patrick Jenkin MP
Secretary of State for Social Services
Alexander Fleming House
Elephant & Castle
LONDON
SE1 6BY

16 December 1980

2,4,5-T - REPORT BY ADVISORY COMMITTEE ON PESTICIDES

In George Younger's absence in Brussels, I am writing to support the line suggested by Peter Walker in his letter of 11 December. It seems to me essential that we should continue to rely on the expert scientific advice provided by the Advisory Committee in this area and therefore to accept the recommendation that approved 2,4,5-T herbicides are safe when used as recommended at present.

I note the concern of the Health and Safety Executive about publishing the related case studies but, in the circumstances in which the Advisory Committee was asked to advise, I agree that it is appropriate to publish these studies without disclosing the names of the people concerned. I am quite content with the lines proposed for the written reply.

MANSFIELD



MINISTRY OF AGRICULTURE, FISHERIES AND FOOD
WHITEHALL PLACE, LONDON SW1A 2HH

Home Affairs
2

cc Mr Ingham

PRIME MINISTER

From the Minister

The Rt Hon Patrick Jenkin MP
Secretary of State for Social Services
Alexander Fleming House
Elephant & Castle
London SE1 6BY

[Handwritten scribble]

You may get some reaction
to this because of DT's firm -
11 December 1980
but there seems to be no
difficulty in the decision itself
MS #12

2,4,5-T - REPORT BY ADVISORY COMMITTEE ON PESTICIDES

I have just received an advance copy of the ACP's Report on 2,4,5-T herbicides in the manuscript - amended form that it has been sent for printing. I understand that similar copies have been sent to your own and all other Departmental Members who serve on the Committee. I have agreed to consider the Report in this form with the aim of publishing it, together with an announcement to Parliament of the Government's reaction to it, before the Christmas Adjournment.

The Committee's findings are very much on the lines foreshadowed by Professor Kilpatrick when you and I saw him, in company with Patrick Mayhew and Marcus Fox, on 31 July. The Report is unanimous in recommending that these herbicides can safely continue to be used as presently recommended. At the meeting we all agreed that we must rely on scientific advice in taking decisions on questions of this kind; and I therefore propose to announce acceptance of the Committee's central conclusion. However the Report also contains a number of suggestions concerning pesticides generally which can usefully be remitted for consideration elsewhere, eg those concerning operator exposure studies would doubtless be taken up within the HSC's Tripartite Committee arrangements. This would also follow the line adopted at our July meeting.

As arranged at the meeting, the Chairman and some Members of the Royal Commission on Environmental Pollution have been given a confidential preview of the Report. I understand that they are well content and that Sir Hans Kornberg will be writing to Michael Heseltine to that effect. I have also been made aware of, and fully understand, HSE reservations about the principle of publishing the related case studies albeit without disclosing names. However these were a central feature of the NUAAW's published dossier which was remitted to the Committee, and I share the Committee's view that failure to disclose the findings would detract from the credibility of their Report and could too easily suggest that there was something to hide.

/Unless there are ...