



Biosecurity and animal traceability need fixing

The recent foot-and-mouth disease (FMD) case in Germany has highlighted weaknesses in the UK's biosecurity at the borders (News, 7 February). However, we must make the distinction between legal commercial shipments of meat, which the Border Target Operating Model is there to manage and which is all pre-notified with full export health certification, and the illegal meat being brought in to the UK in smaller vehicles that can only be detected via a system of intelligence and spot checks at the ports.

For illegal meat imports, Brexit has not changed anything. EU member states as well as the UK can now, and always could, impose border checks based on risk assessments. What seems to have happened is that the level of criminal activity has increased. It has become more lucrative and easier to smuggle cheap, illegal meat products into the UK which get distributed via the criminal network.

For legal meat imports, when the FMD case was announced, all imports of meat from Germany could and should have been stopped immediately. It actually took several days. There should have been a blanket ban on individual travellers bringing any meat or dairy into the UK, which poses just as big a risk to biosecurity as illegal imports. Disinfectant mats should also have been placed at all ports of entry for foot passengers and vehicles.

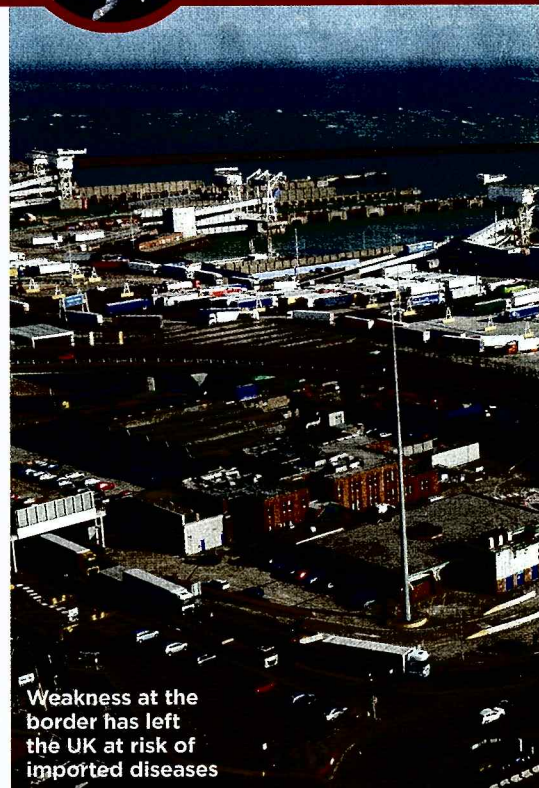
The other angle to this is traceability. The reason FMD spread so widely and quickly in 2001 was that animal movements continued for several days after the first case was reported. There was no real-time digital system to track where they went. We now have a system and the tools to quickly shut down animal movements within the UK should FMD reach our shores. It's called the Livestock Information Service. However, its use isn't mandatory and movements only get notified after an animal movement has taken place. In other countries licences must be applied for before animals are moved, which makes it easier for the authorities to control the spread of disease.

We need government to make the use of this existing traceability system mandatory for cattle and sheep, and for licences to be applied for in advance. Without that, the UK has no ability to lock down animal movements the minute a notifiable disease is discovered.

Nick Allen, British Meat Processors Association, Clerkenwell, London

Arable land wasted on growing weeds

I am a retired agronomist and, while visiting east Dorset last year, the local farming community made me aware that 800 acres of good



Weakness at the border has left the UK at risk of imported diseases

arable land, taken in-hand by the National Trust, was being "rewilded". What I saw was nothing but weeds, including ragwort, with zero food production. The 10-year Countryside Stewardship Agreement made with the Trust was for meadows, wood pasture, trees and shrubs.

While the outcome would be good for wildlife and insects, should good food-producing land be totally given over to minimal food production? It is right that we produce our

TALKING POINT: GEORGE EUSTICE, CONSULTANT AND FORMER DEFRA SECRETARY



Time for a new approach to regulating biopesticides

The "emergency authorisation" of pesticides is often misunderstood. Inherited from the EU, it was designed to allow regulators to adopt the precautionary principle, but to have the option of allowing controlled and judicious use of pesticides when essential. The recent decision not to grant an emergency authorisation on the use of thiamethoxam in sugar beet, coupled with signals that the government intends to remove emergency authorisations altogether, makes it essential that ministers commit to modernising the current regulation of biopesticides. Without change, there will be chronic loss of plant protection options, with major impacts on UK food production.

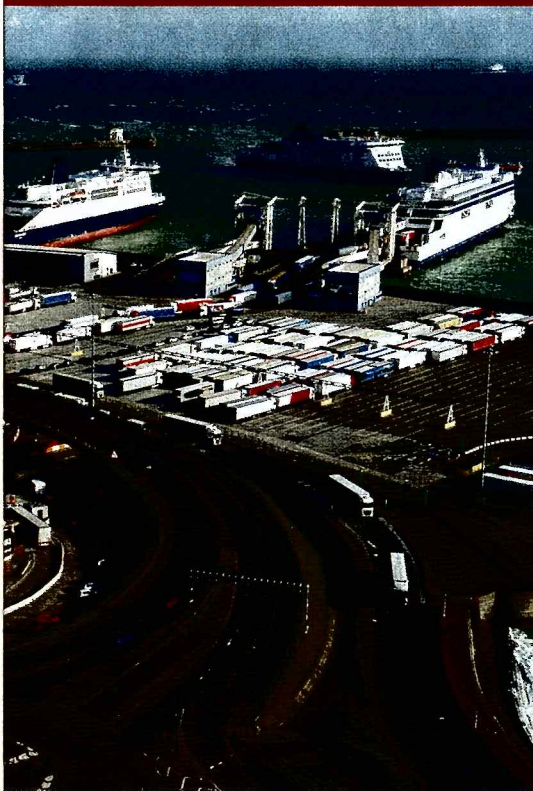
Biopesticides fall into three main categories. Firstly, there are those which use biochemical pheromones to deter certain insect pests, or to disrupt their reproductive cycle, or lure them to traps. Secondly, there are beneficial bacteria and fungi, or natural biochemicals, that either boost the natural defences of a plant against fungal diseases or directly create defences for the plant. Finally, there are "plant incorporated protectants", where precision-breeding techniques can be used to breed traits into a plant to synthesise natural resistance to certain pests and diseases.

Legacy laws

Currently, UK policy on microbials and pheromones is governed by legacy

EU laws. Biopesticides are regulated in much the same way as synthetic chemical pesticides, even though they often use compounds that are well understood and often abundant in the natural environment and the human food chain. But as soon as a biological product makes a plant protection claim, it is forced through the same regulatory regime as synthetic chemicals.

In reality, the boundaries between good nutrition, a healthy soil biome and plant health overlap with crop protection objectives. It is ridiculous to regulate biopesticides in the same way as synthetic chemical products, where new compounds with unknown long-term impacts are released into the environment.



Foreign farmer policy isn't thought through

With all the furore about skilled migrant visas, and the debacle of the inheritance tax announcement, readers might be surprised to learn that, under job category 1211, the government will accept applications for "middle-skilled" migrant visas for "farm owners" from abroad. I'm not sure new immigrants were the people she had in mind when chancellor Rachel Reeves set out to make more farmland available by forcing incumbents to sell. Yet another example of how this government isn't too bothered about thinking through its policies.

John Scott
East Bridgford, Nottinghamshire

Where's the premium for Red Tractor audits?

I read with some interest that Red Tractor is considering a few minor adjustments to its mind-numbing collection of "must dos, or you'll be shot at dawn" edicts.

The best idea is removing the need for an Assured Combinable Crop Scheme audit on feed grains. Sounds great, if that's all you produce. But let's move things on a little further and remove the need for audits on other combinable crops – after all, we know full well that thousands of tonnes are routinely imported without the equivalent standards. And where's the premium for all our efforts, with the standards imposed on us? I've yet to see it.

Name and address supplied

food in an environmentally sensitive way, but this is taxpayers' money being used for inappropriate and wasteful use of quality land.

We need habitats to sustain wild plants supporting wildlife, but it must be in harmony with, and not at the expense of food security. The government needs to sort out its priorities and encourage sustainable food production, not paying for good land to grow weeds.

Malcolm Harrison
Husbands Bosworth, Leicestershire

In human health, it has long been established that traditional herbal medicines should be regulated very differently to pharmaceutical drugs, because they are naturally occurring compounds. There is a proportionate registration scheme for such products.

Through the Genetic Technology Act, Defra established a registration scheme for precision-bred organisms, which replaced outdated EU processes.

Modernised system

So, how might would a modernised system work for biopesticides? A company seeking to bring a product to market could submit an application to the Health and Safety Executive for a marketing authorisation under a new biopesticide marketing authorisation scheme. If the product was derived from naturally occurring compounds, they would be judged eligible for the registration scheme. The process could be supported by the establishment of a

"green list" of commonly used natural compounds in agriculture.

Following assessment for eligibility for the scheme, both the Food Standards Agency and the Advisory Committee of Releases to the Environment could carry out risk assessments on health and the environment respectively. They could be asked to triage products into a light-touch "Tier 1" assessment, or a more detailed "Tier 2" assessment, just as it happens now with precision-breeding techniques such as gene editing. The National Action Plan on pesticides is long overdue, but was always an opportunity to reset the approach on pesticides.

The current approach is out of date, at odds with the approach taken in other jurisdictions such as Canada and the US, and inconsistent with the modern UK approach for precision breeding techniques. It is time for change.

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