

## **BOHS Response to the Defra consultation about the future of the Pesticide Safety Directorate**



**Question 1.** Bearing in mind the different regulatory regimes which apply, do you consider the proposition has the potential to deliver more coherent and effective approval and regulatory processes for the pesticides, biocides, detergents and chemicals industries than current arrangements? Please give your reasons.

Yes. BOHS are strongly in favor of the PSD being merged into the HSE and we would welcome a more coherent approach to each of the main areas of chemicals regulation. In addition, we see benefits in terms of efficiency by concentrating the UK's expertise in pesticide and chemical regulation within a single organisation.

**Question 2.** Do you consider that HSE's low risk approach to implementation sufficiently mitigates the risk of loss of business continuity, focus and expertise? If not, please give your reasons.

We believe that the low-risk implementation strategy is initially the best approach, but we would hope that ultimately there will be a strategy to produce a coherent pesticide / chemicals focus, either within HSE or as a separate entity, e.g. a Chemicals Agency.

**Question 3.** Do you consider that the following measures:

- retaining strategic pesticides policy in Defra;
  - the proposed governance structure;
  - maintaining existing working relationships with the FSA and EA; and
  - HSE's commitment to develop environmental capability;
- will sufficiently protect the environmental and consumer focus of PSD's work?  
If not, please give your reasons.

Yes, we favour Defra retaining the responsibility for pesticide policy and consider that the proposed governance structure is appropriate. We have no doubt that HSE will take sufficient care to protect consumer health and the environment. We believe that the Advisory Committee on Pesticides is an important mechanism to allow all stakeholders to input to the work of PSD.

**Question 4.** Do you consider that the interests of agriculture and horticulture can be accommodated through Defra's strategic policy role and stakeholder engagement through the Pesticides Forum? If not, please give your reasons.

Yes.

**Question 5.** Do you have any other concerns about PSD joining HSE? If so, please give your reasons.

No, this is much the best solution for the PSD under the Hampton process.