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Richard Benyon MP  
Minister for the Natural Environment and Fisheries  
DEFRA  
Nobel House  
London  
SWA 0AA

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Dear Richard

I am writing on behalf of the Angling Trust and our member clubs and fisheries on the River Kennet in order to follow up on some of the issues that were raised at the meeting in Hungerford Town Hall on July 11th that we both attended in the aftermath of the appalling chlorpyrifos pollution of the river between Marlborough and Hungerford.

As you know the upper Kennet suffered a serious macro-invertebrate kill when an extremely small quantity of chlorpyrifos entered the river having passed through Marlborough STW. The Hungerford meeting, which was attended by over 50 river keepers, riparian owners, estate managers, farmers, parish councillors and members of Action for the River Kennet (ARK), was alarmed to discover that there appears to be no restrictions on the sale or use of this highly toxic pesticide.

Indeed it took you and me no more than a couple of minutes to find where to order it on-line with a next day delivery for around £33.00. The details from Pitchcare, which advertises the supply of one litre bottles of chlorpyrifos under the brand name Cyren, are below but there several other suppliers advertising for domestic customers on-line..

<http://www.pitchcare.com/shop/professional-insecticides/cyren-chlorpyrifos-1l.html>

Interestingly whilst reference is made to compliance with HSE codes for the use of this chemical by professionals no such obligation appears to apply to domestic users. I've reproduced below the warning from the Pitchcare advertisement.

## Safe Use of Pesticides

The purchaser and/or end users are responsible for ensuring that these products are used in line with industry Approved Codes of Practice. All operators must be trained and certificated in using and applying any Ministry Approved professional product.

Use plant protection products safely. Always read the label and product information before use.

Please be aware that by proceeding you are purchasing a professional pesticide product. You must ensure the end user of these products complies with the DEFRA/HSE Code for the Safe use of Pesticides:

*"By law, everyone who uses pesticides professionally must have received adequate training in using pesticides safely and be skilled in the job they are carrying out."*

### Previous Chlorpyrifos Pollutions

As you know Chlorpyrifos is used on lawns and golf courses and to tackle insects on crops and some soft fruits. It is the same pollutant that wiped out a large section of the River Roding in 1985, the River Wey in 2002 and 2003 and led to a significant fish kill on the Sussex Ouse in 2001. It was banned in Singapore in 2009 for use in termite control in soil and the United States phased out chlorpyrifos for use in buildings and residential homes and pre-construction sites from 2001 due to public health and environmental concerns. The US Environmental Protection Agency (EPA) has moved to limit the use of the chemical near salmon rivers because of possible damage to fish and has been petitioned to introduce a total ban following reports that it can cause damage to human health.

### Industry Concerns

The Chemical Industry in the UK is clearly worried about the prospects for the future use of chlorpyrifos which is why they are funding their 'Say No to Drift' campaign to promote safer and more responsible forms of use. This has been triggered by the on-going 'risk assessment' for chlorpyrifos under its EU and UK routine review which means that the existing label non-spray buffer zones, adjacent to watercourses, are no longer considered sufficient by the Chemical Regulations Directorate (CRD). Chlorpyrifos products remain available in the UK while the CRD final decision is pending. The industry is urgently encouraging professional end users to adopt low-drift nozzles and appropriate larger buffer zones as the solution – "to give CRD the confidence to renew the registrations."

The 'Say No to Drift' campaign states that *"Continued availability of chlorpyrifos is under threat due to more stringent EU environmental standards to further protect the aquatic environment and meet regulatory requirements."*

More details can be found here... <http://www.saynotodrift.co.uk/say-no-to-drift-campaign/>

## **New Restrictions Needed**

Experience from other countries as well as the catalogue of environmental disasters caused by chlorpyrifos, of which the upper Kennet is but the latest, must surely tell us that the current controls are simply not fit for purpose. In fact the Angling Trust wants to know why a lethal chemical like chlorpyrifos is allowed to be used anywhere near a river or watercourse. Apparently the 15 kms wipeout of invertebrates between Marlborough and Hungerford may have been caused by as little as a couple of spoonfuls and was almost certainly the result of an irresponsible domestic disposal. We hope you will agree that the the sooner we follow the lead of Singapore and America and ban the domestic use of chlorpyrifos the better off our rivers will be.

We have asked Paul Hickey; the Environment Agency's Head of Water Quality to detail the monitoring of this substance across England's Water Bodies in accordance with the requirements of the Priority Substance Directive and to inform us of any breaches of the required Environmental Quality Standards in recent times in order that we can better understand the impacts of this chemical on our rivers. We were extremely pleased to hear from Paul that this information would be with us as soon as possible.

As you know at this stage we are not campaigning for an outright ban but for chlorpyrifos to be removed from general sale and for its use to be restricted to trained professionals only and operating under new and more stringent conditions that include restrictions on its use anywhere near watercourses of any size.

Finally, we are worried that the problems with the disposal of chlorpyrifos might just be the tip of a chemical iceberg with garden sheds and other storage places housing a range of substances that could prove lethal to aquatic life. In the past there have been a number of initiatives advising people how they can dispose of all unused chemicals and empty containers responsibly. We feel it is time that these arrangements are reviewed.

We look forward to hearing from you

Best Wishes

*Martin*

Martin Salter

National Campaigns Co-ordinator

Angling Trust

