MINISTRY OF AGRICULTURE FISHERIES AND FOOD

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WHITEHALL PLACE LONDON SW1A 2HH
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/Joint Announcement by the Agricultural Departments in the United Kingdom/

December 17, 1980

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

In a Written Reply to a Question by Mr. Colin Shepherd, M.P., in the House of Commons today asking when the Advisory Committee on Pesticides would be reporting on their further Review of 2,4,5-T herbicides; and if he would make a statement, the Rt. Hon. Peter Walker, M.P., Minister of Agriculture, Fisheries and Food, said:

"The Report is being published today and copies are being placed in the Library of the House. In the light of the available medical and scientific evidence the Committee has advised that 2,4,5-T herbicides can safely be used in the United Kingdom in the recommended way and for the recommended purposes. The Government accepts this advice. The Committee have also made some suggestions, mostly concerning pesticides generally, which will be considered by the appropriate Government departments and agencies in consultation with interests concerned. My right hon Friends and I are most grateful to Professor Kilpatrick and his Committee for the skilled and detailed attention they have given to this important and sensitive Enquiry."

NOTES FOR EDITORS

1. The Advisory Committee's further Review of 2,4,5-T herbicides follows arrangements which the Minister made for them to examine the Dossier on these products which he had received from the National Union of Agricultural and Allied Workers (Press Notices No. 108, 119 and 315 of March 12 and 18 and August 19, 1980 respectively).

2. Copies of the Advisory Committee's Report can be obtained, free of charge, from Pesticides Branch, Ministry of Agriculture, Fisheries and Food, Rm 678, Great Westminster House, Horseferry Road, London, SW1P 2AE.

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December 17, 1980

ADVISORY COMMITTEE ON PESTICIDES
REPORT ON A FURTHER REVIEW OF 2,4,5-T HERBICIDES

There is no valid medical or scientific evidence that 2,4,5-T herbicides harm humans, animals or the environment if they are used in the recommended way and for the recommended purposes. That is the unanimous verdict of the Advisory Committee on Pesticides in a Report published today.

The Report covers a further Review of 2,4,5-T herbicides undertaken at the request of the Minister of Agriculture, the Rt. Hon. Peter Walker, M.P., after he had received a Dossier on these herbicides from the National Union of Agricultural and Allied Workers in March 1980.

Chapter I of the Report summarizes the main developments relating to 2,4,5-T since the Committee's previous Report was published in 1979. Chapter II, which is written for the general reader, is an appraisal of evidence concerning the safety of these herbicides. It includes the results of 20 case studies. There are also sections dealing with mammalian toxicity; human and operator exposure; the environment; analytical determinations; alternatives to 2,4,5-T herbicides; and international and other comparisons. The appraisal is supported by a number of appendices describing the case studies and dealing with more specialist aspects of the Review. The Committee's Conclusions, as in Chapter III, are reproduced in the Annex overleaf.

In a Foreword to the Report the Chairman of the Advisory Committee (Professor R. Kilpatrick, M.B., Ch.B.,M.D., F.R.C.P., F.R.C.P(Ed.), Dean of the Faculty of Medicine at Leicester University) describes the constitution and work of the Advisory Committee, and of its Scientific Sub-Committee, including the role of the many Government Departments concerned.

ANNEX

EXTRACT FROM THE ADVISORY COMMITTEE ON PESTICIDES' 'FURTHER REVIEW OF THE SAFETY IN USE IN THE U.K. OF THE HERBICIDE 2,4,5-T' DECEMBER, 1980

III - CONCLUSIONS

1. What we have had to consider in this Review is whether there is any sound medical or scientific evidence that humans or other living creatures, or our environment, would come to any harm if cleared 2,4,5-T herbicides continue to be used in this country for the recommended purposes and in the recommended way. We have found none.

2. We have cast far and wide in the search for such evidence. In the process, as will be seen from the more specialized Appendices of this Report, we have noted and described some extreme conditions to which humans and animals have been exposed without untoward effects - conditions which in some cases could never be experienced, for example, by a pesticide operator even if he spent every day of his working life spraying 2,4,5-T herbicides without taking adequate precautions. It is this process of establishing safety margins that is all-important because, as we observed in our previous Report, there can never be total proof of the safety of any product of any kind, and because dosage alone determines poisoning. Mindful of this, and when dealing with risks associated with 2,4,5-T herbicides, we have sought to put them in proportion and perspective. They need to be related to risks which confront individuals in their daily life, and particularly those whose daily work lies on our farms and in our forests.

3. What we have found in the course of the Review are some indications that human health risks posed by dioxin contamination in 2,4,5-T formulations may hitherto have been over-estimated. This does not detract from the importance of keeping strict control over the presence of any dioxin contaminant. We have therefore welcomed technical advances in analysis which enable any dioxin content to be measured effectively, at new and far stricter standards, both in the unprocessed acid as imported and in the formulated herbicide as marketed. Similar technical advances would be needed if sales to major users at the intermediate or ester stage were to be resumed. Meantime the nature and workings of present controls over dioxin contamination are described in the Report and we are satisfied with them.

4. With the introduction of still stricter controls against dioxin contamination, and a clearer picture of the human health risks it presents, the emphasis of medical and scientific attention has been tending to focus more on the properties of 2,4,5-T itself. Here we are able to confirm the conclusions reached in our previous Report. These were based on evidence, some of it subsequently reinforced, that 2,4,5-T had not been shown to cause cancer in experimental animals; that its teratogenic effects in rodents have not been demonstrated in other larger animals, or in the course of long-term studies on humans; and that in the unlikely event that it was a mutagen it could only be a very weak one, so that any possibility that this could affect any user would be negligible even if he or she neglected recommended precautions.

5. Nor have we had any reason to modify these conclusions in the light of investigations into the various case studies which formed part of this Review. What has disturbed us is the circumstances in which some of these cases came to be developed or publicized and we have made suggestions for an alternative approach. However some of the case studies illustrate a problem which we have examined at some length and which extends beyond 2,4,5-T herbicides and indeed pesticides generally. For varying reasons recommended precautions may not be observed; and with pesticides the attendant risks can depend not only on the substances that are used (and 2,4,5-T does not give any exceptional cause for concern) but also on the method of application (where growing recourse to Ultra Low Volume techniques gives cause for extra care). These are the areas that deserve attention and effort by all concerned with pesticides, and we have pointed to some of the forms it might take.

6. A feature which recurs throughout our appraisal of evidence is that 2,4,5-T herbicides have been in use much longer than most other pesticides. This is significant for at least three reasons. Firstly, the fact of continued demand for over a quarter of a century testifies to their usefulness and, as we have discussed, to the limitations of such alternatives as are yet available. Secondly, it means that in contrast to newer products, for which comparable reassuring experience has yet to accumulate, there is no occasion for us to recommend limited clearance based upon restricted levels of use; and our safety assessments are not conditioned by any fluctuations or aberrations in estimates of the amounts actually used. Total usage of any and all pesticides is, however, of increasing significance in terms of safeguarding the environment; and in this respect what favours 2,4,5-T herbicides is not so much the small amounts that are used but the fact that they answer to the key environmental criteria by

lacking persistence and by acting selectively against the target weeds concerned. Thirdly, and most importantly from our standpoint, the fact of continuing production and use over this extensive period has provided a basis for long-term exposure studies, themselves reassuring, which cannot be undertaken with most other pesticides. However such studies have hitherto tended to be retrospective and this can make for the kind of practical difficulties, such as lack of relevant clinical or other data, encountered in some of the case studies investigated in this Report. We have therefore pointed out that where there are grounds and scope for epidemiological studies of this kind, there are advantages in constructing them on the basis of future health trends among those concerned.

7. Finally, looking within and beyond the UK, we have touched briefly upon differing practices concerning the use of 2,4,5-T herbicides and we have stressed the need to compare like with like. In that context we conclude by remarking upon the resemblance between the present controversy surrounding 2,4,5-T herbicides and events which occurred ten years ago. In 1970 the use of 2,4,5-T was restricted in the USA following publication of some studies which incorrectly imputed toxic properties to 2,4,5-T. Pressures duly built up in this country to a point where, for example, the Forestry Commission temporarily suspended its use. Some months later, and following a Review by our predecessors on the Committee, Parliament was informed that limitations on existing UK use would not be justified. In due course the Forestry Commission resumed operations in this country and the suspended American uses were also restored.

8. Last year, following publication of the Oregon studies that have now been so widely called into question, history has seemingly repeated itself. This may happen again. If so there may be calls for precipitate action because ill-founded allegations on sensitive subjects can cause anxiety and will usually command more attention than any measured rebuttal some time after the event. Looking to the future we believe that the history of 2,4,5-T herbicides has now clearly upheld the case for enquiry to precede action, rather than vice versa.

9. We shall continue to examine any soundly based new evidence or information. For the present, this Enquiry has strengthened us in our previous view that 2,4,5-T herbicides can safely be used in the UK in the recommended way and for the recommended purposes.