Blind precaution: Europe's obsession with Precautionary Principle blocks agricultural innovation

When you leave on a journey, would you rather use a map (one that may not be 100 percent accurate, but is regularly being checked and updated), or just a compass which in the past has proven to not work very well? If you use the broken compass, at what point will you realize you are lost? That is the difference between trusting science (using maps) or using the precautionary principle as your guiding tool.

The precautionary principle is like a bad compass – when it points us in the wrong direction, it could take a while before we realize we are lost.

At that point, when we conclude that we must have taken a wrong turn, the question would not be: Why did I trust this bloody thing? But rather: How do I get somewhere from where I am? We don't seem able to accept that the compass is useless.

Those who think that the precautionary principle is a compass to direct us where we need to go believe that precaution should be used at the outset (the so-called David Gee "reversal of the burden of proof" that has perverted what used to be a reasonable policy tool – see my earlier views). I'll argue here that using the David Gee version of precaution is like heading out on a journey with a broken compass (and no map). Only an idiot, or someone extremely sure of themselves, would be so reckless.

But first, an illustration.

Blind precaution

Imagine a precautionary scenario that many argue we should have taken. In 2002, the UK Stewart Report concluded that mobile phones were hazardous, could not rule out adverse health risks (page 3) and advised that children and teenagers should not use phones (or reduce use to as little as possible) to protect brain development. In today's weak regulatory climate, that would have been enough for policy-makers in the European Commission to have invoked the precautionary principle and banned mobile phones. This was still in the early days of mobile technology, before the smart-phone, wifi everywhere and the "make-my-friends-jealous" obsession that today blurs the millennials' lack of self-esteem. In 2002, taking a turn to banning mobile phones was doable!

Now what would have happened if the EU had followed that bad compass and banned mobile technology? Innovation would not have stopped, but it would have followed a completely different route than we have taken over the last 15 years, perhaps without realizing how lost we had become. Land-line technology would have progressed – maybe we would have remote points on each lamp-post that would let people plug some personal phone pods, provide maps, news and email access. Text messages would

have continued and maybe insulting strangers in fewer than 140 characters would have adapted since location hubs would make people feel less safely arrogant (and more social). Connecting cables would have become fashionable and teenagers would have adapted wearables to include cable outlets.

We would have been lost in this precautionary-filled cabled world, but we would not have known how badly the broken precaution compass had misdirected us until we had discovered some other continent that had allowed mobile technology to have developed to the level we have attained today. Maybe we would never have known. In 2002 other countries and regions had not yet learnt how Europe was preparing to drive its economy and agriculture into decline with this anti-business, hazard-based regulatory death-wish. It would have been quite likely that America, Japan and Korea would have also followed Europe's lead in taking precaution. (Africa, by the way, would have never then had the mobile technology jump-start and would have suffered even more, ... but we all know in Brussels that Africa doesn't matter!)

One thing is sure. After 15 years without any increase in brain tumours, everyone in the EU would have been patting themselves on the back saying what a wonderful compass they had followed.

EU agriculture policy: How lost are we?

The EU's use of the precautionary principle on agricultural technologies is a bad, broken compass. How far lost are we? The EU went from being a region producing food surpluses to a trade zone that can no longer feed itself. Banning most GMO production, the EU is forced to import GM feed in order to raise livestock. The recent precautionary moves on neonicotinoids and now glyphosate means that certain insect infestations like the cabbage stem flea beetle, and the inability to efficiently control weeds, will further reduce agricultural yields.

We continue to follow this bad compass down a path with no concern for the consequences. Can we continue to rely on others to feed us? How many famines in Africa in the next decade will be due to our demand for that continent to adopt medieval agricultural practices to meet our food needs? Relying on a bad compass makes us blind to signals that we are lost. There will be those in 15 years who will pat themselves on the back saying: "Yay! We still have bees!" Well ... the bees, as data shows, were not suffering as claimed, and where there were issues, it was not from pesticides!!!

The EU compass has taken us down a non-GMO route for two decades. Unlike the hypothetical mobile-phone-free precautionary decision, we can see very clearly that other countries and farmers have done very well with a wide variation of seed technology and agro-innovation. If our regulators would look up from their spinning magnetic needle they would maybe reconsider the path they had chosen. They wouldn't have to look too far. Prior to joining the EU, in 2007, Romania was a major exporter of GM soy. To comply with EU accession criteria, they had to shift to non-GMOs. Today, despite perfect agricultural conditions, Romania imports soy (even with CAP subsidies!).

But regulators can't seem to see that. There are many people and activist organisations forcing their heads down to blindly follow that broken compass.

I've got a better compass!!!

There are those (the ones who usually don't get past the first paragraph of any Risk-Monger blog) who will retort that it is the *science compass* that is broken, taking us down the wrong path with these technologies, risking human health and the environment, and that it is the precautionary principle that puts us out of danger and back on the right path. But science has built in mechanisms to check the compass, to correct paths, to right itself if the technology has shown to have unexpected drawbacks or consequences. It's called maps! Science is a map – regularly checked, updated – it might not be perfect, but it improves with each new technology. On the other hand, when we live by the precaution impulse, we may never have the means to know how lost we have become. There is no self-checking mechanism in that precaution compass. Imagine if we were using that mobile-pod lamp-post – we'd think we are so advanced!

This is exactly the point! The precautionary principle is being used as a compass to guide us, with the promise that innovation will follow, but it is not actually a compass at all (no wonder it does not work!). Precaution should come into any decision-making process when the scientific level of uncertainty is starting to raise significant concerns. At that point, scientists will push for precautionary alternatives (although maybe not fast enough for some, but people love to over-react).

No doubt, some anti will throw the tobacco industry stonewalling at me ... fine ... if you have to go back to the 1950s to find a counter-example, I feel sorry for you. We must not put precaution up at the start of the assessment of a new technology, unless the only thing we want to do is block technological development.

But with EU pesticide policy, precaution is being used prima facie: if you can't prove with certainty that neonicotinoids are not killing bees (although evidence points elsewhere) or if you can't prove with certainty that glyphosate does not cause cancer (even though all institutions except IARC's tainted hazard assessment thoroughly reject this claim) then we must, according to EU regulations, take precaution.

The anti-pesticide NGOs using precaution as a compass know exactly where they want to go ... they are not even looking at the spinning compass needle and don't care that it doesn't work. They are willfully blinded and because of expedient regulatory handcuffs in the EU, we are being forced to follow them!

Entering the "Endocrine Triangle"

This bad agricultural policy compass is about to lead us into an abyss when the EU endocrine disruption criteria begins to kick in. It is likely that no pesticides (including the 3000 plus pesticides approved for organic farming) will be authorized for use in the EU after the hazard-based EDC criteria are applied.

What will this mean for farmers? There will be some derogations to ease the transition, farmers will stop growing many crops (OK, fine, the EU will become a global exporter of alfalfa ... brilliant!). Food prices will go up, yields down to the point of a new normal.

I expect we will see substance after substance taken off the market for not being able to prove with certainty that they have no potential effect on the human endocrine system. Because of the chaos, black markets will be more tightly controlled since farmers will be forced to find other means to protect their crops ... or give up farming in large numbers. This bad compass will lead us to a generation of lower yields, more agricultural subsidies, greater outbreaks of pests and fungal diseases, until we reach a

certain point, when food imports will have a serious effect on the European economy, that someone in Brussels might realise we are lost.

Or someone in DG Santé will declare success: that the EU has become a producer of luxury food (offshoring farming like the deindustrialisation of the last two decades) assumedly preventing millions of cancers a year. What a lovely compass!

Do we even need to take this journey?

With the EU being forced to use the endocrine compass to lead them into *Precautionary Alley*, shouldn't someone, at some point ask the question: Is there actually evidence that the human or animal endocrine systems are suffering? The activist scientists have had a two-decade history of failed predictions and woefully comic scaremongers. Our sperm counts <a href="https://have.not.gone.com/have.gone.com/have.not.gone.com/have.gone.com/have.not.gone.com/have.not.gone.com/have.g

The EU took a wrong turn years ago, with the revision of 91/414 – the Pesticides Directive (where the endocrine provision was added without any reasonable thought) and has been following this bad compass in the wrong (hazard-based) direction since. A rational person would retrace his or her steps, go back to the wrong turn, start again and re-do that horrid legislation.

But our leaders still believe the compass is correct.

- How many farmers will have to quit their profession?
- How many lost yields and increased imports will Europe need to see?
- How many famines in poor countries enticed to adapt its agriculture to feed a hungry (organic) EU
 will we need before someone in Brussels begins to question this compass?

How many times will I have to use the word: Stupid?

The precaution compass is useless – totally broken – it is time to throw it out and rely on a map. We need to once again trust our ability to follow the map. Maps are scientific, developed, tested and improved ... That's how science works – the precaution mavens have to get over it! Scientists use reason, data and evidence. Where that precautionary compass has brought us is not the place that any ethically correct, thinking person would want to be.

I know, I know, I am talking to people who tell me it is a good compass ... that endocrine abyss is gonna hurt!

This article appeared originally at the Risk Monger site under the title "Getting lost with a bad compass: Precaution and pesticides" and is being reproduced here with permission of the author.

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