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Envisaged Directive 2008/…/EC of the European Parliament and of the Council establishing a framework for Community action to achieve a sustainable use of pesticides

upcoming vote in the EP

Expert Point of View

on amendment 108

Amendment 108, new annex III a – Elements for general and crop-specific Integrated Pest Management criteria

General challenge:

The amendment suggests:
"Elements for general and crop-specific Integrated Pest Management criteria – Integrated Pest Management as a minimum includes the following general criteria"

Comment:

1. In order to achieve a harmonized community-wide approach to sustainable crop production and crop protection, it is considered useful to agree on a set of general criteria as specified by the Council of the European Union (6124/08 as of 25 April 2008, Annex III).
   However, **developing and implementing "crop-specific IPM criteria"** as suggested by EU-Parliament **neglects the variety of soils, climate-zones and hence growing conditions throughout Europe**. IPM is one important element of Integrated Farming and must be understood as a holistic and systematic practical management approach (tool box) which needs to be handled and adapted according to site and situation.
2. **IPM (and crop specific IPM criteria)** – equally covering growing conditions in Southern and Northern Europe for example – will **either have to be general and unbinding or will have to be specific and therefore narrow down the tool box** available for farmers. **IPM must be understood as "principles" which cannot be generally fixed** but should be defined / specified **in partnership with relevant stakeholders.**
   Recommendation:
   ⇒ **<u>Therefore, annex III should be replaced by general principles for IPM.</u>**

Comments on individual paragraphs suggested in the EP amendment 108:

- ***Issue:***
  (a) "The prevention and/or suppression of harmful organisms should be achieved or supported among other options especially by … use of optimum crop rotation … in order to prevent outbreak of soil-bound pests and to eliminate use of soil fumigants and other soil chemicals."
  Comment:
  Taking care of soil organisms (by means of cropping sequence, fertilization, liming, supply of organic matter etc.) and hence maintaining healthy soils are key issues in agriculture. An **outbreak of soil-borne pests**, however, **cannot be completely avoided** – just as a **flu or other illnesses cannot be generally and completely avoided for humans**.
  With regard to **fruit and vegetable production** in countries of **Southern Europe** in particular,

the suggested **elimination of soil fumigants and other soil chemicals** would **severely cut down farmers' abilities** to grow healthy, affordable and high quality products according to consumers' demands.

- ***Issue:***
  … "use of adequate cultivation techniques, e.g. under-sowing, … , conservation tillage…"
  Comment:
  Due to **limited availability of soil water and precipitation**, **under-sowing can be impossible in some areas**. Besides, **conservation tillage** has **not yet proven to be practicable** on all soils and under all climate conditions.

- ***Issue:***
  … "use of the best available resistant/tolerant cultivars and approved/certified seed and planting material":
  Comment:
  Being part of nature as a flexible and continuously **evolving system, pests and pathogens break tolerances and resistances in cultivars** more or less **quickly.** Besides, **cultivars hardly ever bear tolerances or resistances** against **all relevant pests** at a given site in a given year **and the quality features** required by consumers and/or food industry. Even though **tolerances and resistances of individual cultivars** are decisive elements of variety choice and sustainable crop production, they **do not allow to replace chemical crop protection**.

- ***Issue:***
  … "*preventing the spread of harmful organisms through machinery and equipment****".***
  Comment:
  Clearing machinery and equipment of large chunks of soil or plant residues **can help to lower the risk** of pests being carried from one field to another. However, machinery and equipment **cannot be fully cleaned in the field, and particularly in small scale farming areas** cleaning after each small field is **too time consuming and hence not practical**.

- ***Issue:***
  … "protection and enhancement of important beneficial organisms, for instance by using ecological infrastructures inside and outside production sites, setting aside a minimum percentage of total field area, planting of plant species to attract natural enemies of pests."
  Comment:
  All measures mentioned **are elements of Integrated Pest Management**. However, the **area available** for such ecological infrastructures, set aside areas and beneficial plant species is limited and **will even be more limited in the future**. As world population and food demand are increasing, as emerging markets show increasing demand for livestock products, and as bioenergy is promoted as one aspect of climate protection, **fertile and productive soils become an increasingly scarce resource on a global scale**.
  Besides, the **effectiveness of biological control mechanisms is limited** for a variety of reasons, one being that populations of beneficial organisms will only start to grow and become effective when sufficiently big populations of **pests are already there**. This **temporally offset population development** means that **considerable damage will be caused by pests** before beneficial organisms start being effective. Particularly for pest vectors such as aphids, biological control measures will **not prevent secondary damage** to the crops being **caused by viruses** etc. Hence, biological control measures **can help** to keep pests below threshold levels **but do not offer reliable and effective control**.
  Last but not least, the **different degrees to which ecological infrastructures are part of different landscapes** are one decisive feature of particular **regional man-made environments**. A **minimum percentage "prescribed"** for all different types of cultural landscape would be **counterproductive**.

- ***Issue:***
  (b) "Harmful organisms must be monitored with appropriate methods and tools … as well as professionally qualified advisors, such as those provided for by state and private extension services."
  Comment:
  Appropriate methods and tools are not available for all pests and diseases and in part are very

costly for farmers. Besides, on the national level, **budgets for state extension and advisory services have been decreasing** for years. **Offering schemes for extension and advisory services on Member States level via EU-funds** could be one element of a systematic approach to **high sustainability standards** in IPM.

- ***Issue:***
  (d) "Biological, physical, mechanical and other non-chemical methods must be preferred to chemical methods whenever feasible … Exceptions should be allowed only in case of bad weather conditions during a prolonged period of time that makes mechanical weeding unfeasible":
  Comment:
  This **general rule** including the "bad weather exception" is **not practicable**.
  Conservation Tillage, for example, does **not allow for mechanical weed control**, as each tillage operation will **reduce soil cover** and hence **increase erosion potentials.** Besides, and with regard to greenhouse gas emissions, the **use of heat for weeding is inefficient**, **not practical in established crops** and potentially **harmful to organisms** living on or close to the **soil surface**.

- ***Issue:***
  (e) "The professional user should keep the use of pesticides and other forms of intervention to levels that are necessary, e.g. by reduced dosage, reduced application frequency or partial applications, bearing in mind that the level of risk in vegetation must remain acceptable and that they may not increase the risk for development of resistance in populations of harmful organisms.."
  Comment:
  Particularly the application of reduced **dosage bears the strong risk of resistance build-up and resistance increase** and is hence **counterproductive** to the objective of this passage. Dosage should always be handled **according to label instructions**.

- ***Issue:***
  (f) "Where the risk of resistance against a plant protection measure is known and where the level of harmful organisms requires repeated application of pesticides to crops, available anti-resistance strategies should be applied to maintain the effectiveness of the products. This may include the use of multiple pesticides with different modes of action."
  Comment:
  Development of resistance in pests occurs naturally, i.e. must be accepted as part of natural evolution. **By giving the "general criteria" of Integrated Pest Management to use "reduced dosage** – compare point (e) above – **reduced dosage and application frequency" bear the risk of a considerable fastening of this natural process.**

General Recommendation:

1. Crop specific standards on the European level are not practical and useless on the heterogeneous production sites throughout the EU.
2. General, non-crop specific guidelines for Integrated Pest Management designed for EU-wide implementation need to be kept flexible and open to account for the interrelations in cultivation systems and the differences in site and situation outlined above.
3. However, even with regard to such general and flexible guidelines, there is a considerable need for further discussion on the expert level including a thorough assessment of legislative measures and their impact on the practicability of efficient and sustainable farming practices.

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