

PESTICIDES

The primary function of the rural world is to feed an ever growing population through the use of safe products. Food safety is indeed a major requirement that Europeans consider the responsibility of the agricultural sector. This has been made possible thanks to the development of pesticides, principally composed of the plant protection products (PPPs) and the biocidal products to manage pests, diseases and weeds. This synergy between agriculture and food also means quality and control over production processes and final products, hence representing one of the main strengths of European agriculture.

The XXIst Century sees the development of another crucial function which will help to reduce energy dependency on fossil fuels: the production of fossil fuel alternatives.

Future generations of land managers will thus face an enormous challenge. To that end, they need to have the means necessary to carry out their tasks, while making sure that fulfilling these vital needs will not adversely affect biodiversity. Modern farming is hence inextricably linked to environmental protection and the enhancement of local economies and communities.

ELO through its lobby and awareness raising actions has been constantly recalling that **rural entrepreneurs and landowners are responsible stewards of their land, strongly convinced that business, social and environmental performances are mutually dependent.**

Accordingly, in October 2007, ELO, together with the NFU (UK National Farmers Union) has sent a position paper to the European Parliament as its Environment Committee has voted in favour of overly restrictive legislation, namely as regards the replacement of **Directive 91/414**. This action aimed to ensure that the proposed revision of the Directive will maintain a high level of protection for health and the environment **whilst being consistent with the rest of the environmental legislation package** (ie on water, soil, nitrates, etc), and promote sustainability through proper scientifically based risk assessment, and not hazard based cut-off criteria. It should not lead to a radical reduction in the use of PPPs which would adversely affect the activities of land users. The relationship between the competitiveness as well as the quality of European agriculture and the evolution of the regulatory framework for the placing of PPPs on the market is obvious. In the same vein, in January 2008, ELO jointly with the CLA and the UK National Gamekeeper Organisation sent a position paper advocating for a reasonable use of burrows baiting, indicating to DG ENVI that they were seriously concerned that decisions arising out of the implementation of the EU Biocidal Products Directive would lead to a ban on the use of rodenticides (rat poisons) within rat burrows.

Thematic Strategy on the Sustainable Use of Pesticides

In 2006, the Commission presented its proposal on future European policy on the authorisation and use of plant protection products. It was adopted in July 2006.

This Strategy on the Sustainable Use of Pesticides aims to address the threats posed by the use of pesticides to human health and the environment, whilst maintaining crop productivity. Its objectives are twofold in targeting both the issue at source with regards to PPPs producers on the one hand, and PPPs users on the other.

Together with the Strategy, the Commission has introduced a proposal for a Regulation revising the 1991 Directive on the placing of plant protection products on the market, and a proposal for a Framework Directive that sets out common objectives and requirements aiming to ensure coherence throughout the EU between the MS which have already adopted measures to address these threats and the MS which have not yet done so. It also provides for measures intended to keep users and the general public better informed and measures enabling the impact of pesticides on public health and the environment to be reduced.

It includes proposal of measures such as:

- a ban on aerial spraying, except in special cases;
- national action plans with the necessary flexibility for adapting measures to the specific situation of the various Member States;
- regular inspection of application equipment and measures governing the handling and storage of pesticides, their packaging and remnants;
- protection of the aquatic environment and of areas with "sensitive" groups in line with i.e. the Water Framework Directive, the Birds Directive or the Habitats Directive,
- measuring progress in risk reduction through harmonised indicators;
- establishment of a system of information exchange for continuous development and improvement of appropriate guidance, best practices, and recommendations.

The strategy contains two additional legislative proposals: one on the requirements to be met by new pesticide application equipment and the other on the collection of statistics on PPPs.

The regulatory framework should ensure proper controls of parallel products and guard against the traffic of dangerous imitations/counterfeited products, and ensure competitiveness as well as harmonisation of authorisation where possible. It should also encourage innovation together with Intellectual Property Protection of data and a rapid evaluation of new safer products.

In addition, individual measures should be evaluated in taking into account the economic and administrative burden for farmers and regulatory authorities and there should be flexibility afforded to member states to adapt individual measures to local conditions and practices without compromising the end result.

The current approach is based on the strict application of environmental criteria. ELO condemns the current trend to “delist” certain active substances without satisfactory alternatives. This creates a risk for our members who face serious availability problems for certain categories of pesticides such as insecticides and rodenticides and this is very likely to cause a distortion of competition at a global level. If approved in their current form, the modifications to Pesticides market-access legislation will generate significant negative impacts. A shrink in the capacity for self-sufficiency in the rural world would create inevitable negative repercussions, not only in terms of food supply, but is also likely to impact the whole supply chain composed of the other economic actors (such as agri-food industries, wholesale and retail trade, storage and transport services, etc.), hence ignoring the objectives of the Lisbon Strategy, which aim at “*making the EU the most competitive economy in the world and achieving full employment by 2010*”. We are carefully following this process to best protect the interests of our members.

ELO believes that new products are developed for use according to food and sanitary safety requirements within sustainable agriculture and integrated pest management. They have been placed on the market in order to mitigate the threats to natural resources and soil and are part of good practices when combined with appropriate cultivation techniques such as conservation tillage or use of environmental-friendly machinery. PPPs contribute to high agricultural yields, helping to ensure that good quality food is available at reasonable prices, and biocides/rodenticides are useful for public health protection. Nevertheless, when not used sustainably, some pesticides may have possibly negative effects on human health and biodiversity, which is why a **balanced approach based *inter alia* on training for PPPs users is necessary:**

In this respect ELO is part of the **TOPPS EU project** (Train Operators to Prevent Point Sources).

This project is aimed at identifying the “Best Management Practices” and disseminating them through advice, training and demonstrations on a larger co-ordinated scale in Europe with the intention of minimising PPP contamination in water through agriculture

ELO is also a Friend of the pan-European Sense+Sustainability Campaign launched by its partner ECPA (European Crop Protection). Initiatives such as these campaigns aim to raise standards of agricultural production and reflect the industry’s commitment, together with other partners in the food chain. It encourages farmer training and education, and promotes integrated farming as one of several ways in which sustainable crop protection can be achieved.



Specific Basic Legal Framework

- Plant protection products (PPP) are covered by **Council Directive 91/414/EEC** defining strict rules for their authorisation. The Directive requires very extensive risk assessments for effects on health and environment to be carried out, before a PPP can be placed on the market and used. Community rules also exist that define maximum residue limits (MRLs) on food and feedstuffs. MRLs are set at Community level for about 150 plant protection products and at Member State level for any other unharmonised products.
- The **Biocidal Product Directive (98/8/EC)** aims to provide a high level of protection for humans, animals and the environment and targets the harmonisation of the European market for biocidal products and their active substances.
- **Thematic Strategy on the Sustainable Use of Pesticides** (COM(2006)327 final, adopted 12/07/2006)
- In December 2007 the Council reached political agreement on a common position on a Directive on the sustainable use of pesticides and took note of the state of play on the draft Regulation concerning the placing of plant protection products on the market (11755/06).