



Submission following the Thematic Strategy Conference held in Brussels on 4th November 2002

BASIS provides training for people giving advice in the field and also operates an inspection service for people storing plant protection products (PPP).

As BASIS, I attended the Group III Workshop dealing with national plans for hazard, risk and dependence reduction. In terms of the presentations, the information from Sweden was interesting. Volumes of PPP sold have declined over time but the number of times that a farmer treats the crop has remained static over the past 15 years.

In Denmark, the emphasis is on minimising the number of treatments on a crop.

As I understand it, the authorities in Denmark, The Netherlands and Sweden see little merit in use reduction plans as part of the Thematic Strategy.

In reflecting on the issue of volume data, the introduction of products effective at grams per hectare versus kilograms per hectare has driven the volume reduction process where it has been measured. However, a volume increase or reduction is not necessarily a risk increase or reduction.

As an example, a potato producer may choose to use a product at seven day intervals which is active on the surface of the leaf versus a product which has a systemic action every fourteen days. Which option represents reduced risk? On the basis of volumes, perhaps the product giving a fourteen day interval is better. However, is the risk increased with a systemic product?

On the question of treatment frequency indices (TFI), the first question is to ask which crop we are looking at. Is it the major crops such as cereals, sugar beet or potatoes or is it the minor crops such as fruit and vegetables? The logistics of gathering data in relation to which product was used on which crop was recognised, by the authorities, to be an extremely difficult process when it was discussed at the workshop. The concept is particularly difficult in relation to minor crops.

TFI is related to many factors. The example that I have given in relation to the choice of product on the potato crop is a case in point. The seven day interval pushes up the TFI. In reality, the climatic conditions will have an overwhelming impact. Due to particularly wet weather from mid-April until mid-August in Ireland in 2002, the TFI on most crops was pushed upwards. Clearly, the nature of the product being used and the climatic conditions determine TFI.

In terms of use reduction, the concept of using reduced rates was discussed at some length. The situation in Ireland in 2002 in relation to winter wheat treatment was particularly interesting. Those growers who used low rates early in the season were then faced by five to six weeks of wet weather where crops could not be sprayed. Where low rates of fungicide had been used, the disease pressure due to the wet weather was so high that the crops became heavily infected before the farmers could spray again. The result was that those farmers used high doses on a number of occasions in an attempt to minimise the impact of diseases on their crops. In contrast, those growers who had used recommended label rates early in the season witnessed a situation where their crops remained disease free for the five to six week wet period and they were then able to

use a lower number of treatments to ensure that their crops remained disease free throughout the rest of the season.

As a training organisation, we point out to agronomists that they personally carry legal liability if something goes wrong if they have not used the recommended rate on the label. In reality, this means that an agronomist in the field must be in a position to assess the conditions around him or her in order to determine the possibility to use reduced rates. As an example, if a weed is small and is not covered by a crop canopy, it may be possible to use reduced rates and get very good weed control assuming that conditions for the activity of the herbicide are also favourable. In contrast, if the weed is large, is partially covered by the crop canopy and if conditions for the activity of the herbicide are adverse, the agronomist will know that the full label rate must be used.

As a training organisation, we believe that the possibility to reduce risk centres on the provision of information. By ensuring that agronomists are trained to an acceptable standard, the person concerned will be able to take an informed decision in relation to the possibility or otherwise of reducing the rate of the product. Additionally, that person will also be able to take an informed decision in relation to the frequency with which the crop may need to be sprayed based on the climatic conditions and a knowledge of weed, disease and insect pressure in the context of the particular crop being grown.

Risk reduction can be maximised by training. Use reduction may or may not be related to risk reduction but can best be achieved by training as opposed to setting numerical reduction targets. TFI can be minimised by training resulting in the informed use of "as little as possible but as much as needed".

In relation to the storage of PPP, we strongly advocate the introduction of essential requirements at an EU level in relation to storage by the manufacturer, wholesaler, retailer and farmer. None of us wish to witness a nitrofen type scandal again. Apart from feed contamination, good storage standards minimise operator exposure and help to minimise spillages and fires. Where accidents do occur, an appropriately built store will help to minimise any environmental impact.

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