

Subject: Pesticides - Communication from the Commission to the Council, the European Parliament and the Economic and Social Committee "Towards a Thematic Strategy on the Sustainable Use of Pesticides" - BEUC comments.

Introduction

These are the comments of BEUC - the European Consumers' Organisation on the Communication on a strategy towards a sustainable use of pesticides (COM(2002) 349 final).

BEUC acts on behalf of 34 independent national consumer organisations from 24 European countries.

General comments

BEUC welcomes the request to provide comments on the Commission Communication on the sustainable use of pesticides.

In May 2002 the Food and Veterinary Office of the European Commission published the report of the pesticide residue-monitoring program for the year 2000. The report highlighted the results of the analysis of pesticide residues in 45,000 samples of fruits, vegetables and cereals and revealed that 96% of the food samples did not exceed Maximum Residue Limits (MRLs). Although the results might not seem to be alarming, there are still some remaining questions.

With regard to environmental and food safety aspects we endorse the main objectives of this strategy as identified in the executive summary:

- to minimise the hazards and risks to health and environment from the use of pesticides.
- to improve controls on the use and distribution of pesticides.
- to reduce the levels of harmful active substances, in particular by replacing the most problematic chemicals by safer (including non-chemical) alternatives.
- to encourage the use of low-input or pesticide-free crop farming.
- to establish a transparent system for reporting and monitoring progress including the development of appropriate indicators.

The Commission paper addresses important issues, which are not really new, such as cocktail effects, long-term effects, impact on vulnerable groups etc. We consider the paper however to be too narrow when it comes down to the concrete measures to be addressed.

Moreover we regret that no concrete timetable to reach the objectives has been suggested.

Legislation on pesticides residues in the European Union is complex. Part of the legislation has been harmonised at EU-level, and part of it is still governed by the individual member states. Moreover, legislation on pesticides residues often varies widely between the member states.

We therefore believe that it won't be possible to tackle all issues related to the use of pesticides within one EU Directive and therefore welcome the approach to develop a strategy for the sustainable use of pesticides.

The paper defines plant protection products and biocides separately, but fails to address the latter. Pesticides are linked to biocides and even though the biocide market might be smaller than for pesticides, a horizontal paper of this kind should not have excluded them. Furthermore many if not most of these substances are the same and allowing them in ordinary consumer products for domestic pest control, while forbidding them in industrial and agricultural use is short-sighted. The paper defines the strategy area as dealing mainly with agricultural food production. However, sectors like forestry and flower-growing (Holland, in particular) also consume a large volume of pesticides. The impact on consumer health has led our Dutch member Consumentenbond to advise consumers to wash their hands carefully after handling cut flowers at home.

The paper rightly addresses the industrial use of plant protection products but domestic gardening is a typical area where more and better information could be provided e.g. that methods other than pesticides could be used and that a reduction in the use of pesticides would improve biodiversity in the garden. The possible overuse of pesticides in domestic gardens is likely to be far greater due to the adding of that little bit extra for luck and users not being as educated as farmers or professionals in its use.

Therefore the domestic use of plant protection products should be included as an issue for further consideration, including the need for education.

BEUC recommendations for concrete action towards a strategy of sustainable use of pesticides

1. Reducing health risks is certainly the main point in this strategy.
Therefore aerial spraying, for instance, should absolutely be prohibited, as it has an impact far beyond the intended crop/area, and can pose unnecessary risks to the environment and human health.
2. Obsolete pesticides in Europe can pose a threat to public health. This may even become of greater concern when one considers the candidate countries entering the European Community shortly, as the recent Nitrofen scandal in Germany has shown. Here, the Community was confronted with the contamination of storage warehouses by a plant protection product forbidden in the EU but allowed for use in the former GDR. 11 years after the reunification of Germany this substance was still present and able to contaminate a wide range of feedingstuffs, and consequently affecting food safety. Therefore it is important to have nation-wide inventories of stocks of obsolete pesticides. Appropriate methods of treatment and disposal should be available.

The Commission should now begin to fund the disposal of these substances with the appropriate enforcement of controls in the member states.

3. Over the past few years the EU has been receiving monitoring data on residue levels from the member states. However we urgently need a harmonisation of monitoring and surveillance in the European system to enable the legislator to compare national data and to identify areas for appropriate action. It is equally important to distinguish between imported products and national products. The monitoring data should also reflect comparable consumption data to identify the gravity of individual residue impacts.
4. The current use of substances for plant protection products is still not harmonised at European level. The internal market makes it easy to have access to substances, which are allowed in one country but not in another. BEUC therefore urges the harmonisation of rules in speeding up the evaluation process in directive 91/414 and, on top of this, more effort in the setting of MRLs.
5. The cocktail effects of pesticides have been mentioned as being an issue to be considered and we would like to refer to the executive summary of the UK Committee on Toxicity of September 2002¹. Although the report concluded that the probability of any hazard from exposure to mixtures is small, we think it important, nonetheless to look at the following areas:
 - vulnerable groups within the population;
 - bound residues of pesticides and pharmaceuticals;
 - the combined effect of multiple pesticide residues, including possible synergistic effects of multiple residues;
 - multiple sources of exposure to pesticides.

We would like to endorse the recommendations of the latter report that changes be made to the approval system so that the bodies responsible for authorising pesticides and human/veterinary medicines (in this case in the UK) be required to consider all sources of exposure; and that a scientific and systematic framework be established to evaluate when it is appropriate to carry out combined risk assessments of exposures to more than one pesticide and/or veterinary/human medicine.

Given the challenges that are involved in the use of pesticides in general and the risk perception by consumers in particular, it is all-important that pesticides must be used at levels "as low as reasonably achievable". Consequently, the use of chemicals for crop protection should be part of an integrated crop protection system within the strategy on a sustainable use of pesticides:

1. Specific targets should be designed at national levels to progressively achieve more stringent qualitative and quantitative reductions in the use of pesticides on specific crops and overall.
2. Principles for Good Agricultural Practices (GAP) should be developed which specifically aim at reducing the dependency of agriculture on plant protection chemicals. This may be facilitated by establishing an EU-supported 'GAP research facility'.
3. Least-harmful plant protection practices should be developed and promoted wherever feasible and practicable.
4. Best environmental practices should be applied.

¹ Risk Assessment of Mixtures of Pesticides and Similar Substances, Committee on Toxicity of Chemicals in Food, Consumer Products and the Environment, UK, September 2002, an FSA report.