

Commission Communication on the sustainable use of pesticides

Dear Mrs Hellsten,

I am writing to you as a result of having read the Commission's Communication on the Sustainable Use of Pesticides.

I believe there are a number of elements of this strategy that need to be further considered, and this letter will outline for you the importance of truly integrated farming methods as a means for achieving sustainable agriculture in Europe.

The concept of sustainability is often mistakenly thought to be exclusively concerned with the environment; however sustainability also has economic and social implications. Sustainability requires:

- a. Social progress that recognises everyone's needs
- b. Effective protection of the environment
- c. Prudent use of natural resources
- d. Maintenance of prudent and stable levels of economic growth and development

Indeed, there are several agricultural production methods today co-existing. The Communication mentions organic, but organic farming is but one of various production methods in addition to integrated farming and conventional farming, yet there is a strong public outcry for a push to organic farming. Unfortunately, consumers often lack a clear understanding of organic farming, which is an important market but one that should not be unfairly preferred over other agricultural approaches.

Yields of organically grown crops are lower when averaged over several years and there is no proof that organic production is safer. Given the lower yields, the expansion of organic farming methods would require that a significantly higher proportion of land be ploughed whereas resources of farmland are limited. Such a situation is not sustainable in the long term. I believe that integrated systems like those applying the concept of Integrated Crop Management (ICM) offer better long-term solutions in guaranteeing sustainable production to deliver adequate quantities of food at affordable prices to the consumers, while taking care of the environment.

Integrated Crop Management (ICM) practices are a means for farmers and growers to achieve sustainability in agriculture. This should be further considered within the envisaged Thematic Strategy.

And just to end, mandatory use reduction programmes do not consider qualitative aspects of crop protection products like their environmental properties and are thus not in accordance with ICM.

I hope that you also share my opinion about the importance of integrated farming – how a farming system must be truly integrated in order to achieve sustainable agriculture in Europe.

With kind regards



B. Birk