

**Statement from the Government
of the Federal Republic of Germany regarding the
Communication from the European Commission
to the Council, the European Parliament, and
the Economic and Social Committee
„Towards a Thematic Strategy of a Sustainable Use of Pesticides“
(COM (2002) 342 final of 1 July 2002)**

I.

The Federal Republic of Germany welcomes the presentation of the communication from the Commission of the European Communities.

Germany considers it necessary to clearly substantiate and extend the approach laid down in Article 3 (3) of Council Directive 91/414/EEC of 15 July 1991 concerning the placing of plant protection products on the market. This extension should also be taken as an opportunity to establish a complete strategy for plant protection policy at EU level. An independent complete EU strategy of plant protection policy would not be sustainable in the long run without sufficient coherence with other Community policies.

The goals of such a complete strategy of plant protection policy are as follows:

- ensuring sustainable protection of plants while simultaneously reducing the use of plant protection products by means of application methods, techniques and good plant protection practice and farreaching reduction of risks to human health, animal health and the environment caused by plant protection measures,
- responsible exports of plant protection products as well as
- a sufficient coherence with other Community policies with reference to plant protection (chemicals policy, water policy).

The prerequisites for the development and introduction of such a complete strategy for plant protection are auspicious because the following components already exist and can be included:

- with respect to the placing of plant protection products on the market, provisions are in place governing the classification, packaging and labelling, authorization of plant protection products as well as the control of the placing on the market and use,
- with respect to consumer protection, provisions exist that define maximum residue limits for plant protection products.

The required complete strategy should equally safeguard the following:

- sufficient options to protect plants and plant products against damage, enabling farmers to carry out appropriate protective and control measures according to the location and situation,
- sustainable protection of humans, animals and the environment,
- reduction of risks by optimizing the evaluation of active substances as well as by optimizing the authorization and proper use of plant protection products,
- ensuring the competitiveness of the agri-food sector of the EU,
- improving communication and transparency in plant protection.

II.

The following components form part of such a strategy for sustainable safeguarding of plant protection:

- a) Product-related provisions at a high level:
 - i) assessment of active substances
 - ii) classification, packaging and labelling of plant protection products
 - iii) authorization of plant protection products
 - iv) establishing of MRL's.

- b) Equipment-related provisions:
 - i) use of plant protection equipment with a high technical standard
 - ii) regular checks on the equipment.

- c) User-related provisions:
 - i) expert knowledge of the professional users
 - ii) expert knowledge of the dealers selling plant protection products to non-professional users

- d) Use-related provisions:
 - i) use of plant protection products only according to the principle of good professional practice in plant protection (non-chemical and chemical measures, taking the principles of integrated plant protection into account)
 - ii) special obligation of the user to exercise diligence when using the plant protection product.

e) Area-related provisions:

- i) in principle, restriction of the use of plant protection products to agricultural, forested and horticultural production areas
- ii) ban on the use of plant protection products in and in the immediate vicinity of surface and coastal waters, in principle
- iii) ban on the use of certain plant protection products in vulnerable areas with respect to the protection of certain species of plants and animals as well as to the protection of water.

As far as the responsible exports of certain plant protection products are concerned, this includes

- a) provisions governing the export of certain plant protection products (EC Regulation)
- b) acceptance of the Code of Conduct of the FAO by the EU.