

Mrs Eva HELLSTEN,
Head of the Chemicals Unit, Environment
DG, European Commission,
Office BU-5, 02/01, B-1049 Bruxelles/Brussel,
Belgium.

Dear Mrs. Eva HELLSTEN,

Regarding the mentioned subject, we would like to point out that conservation agriculture will consistently help for a better / environmental friendly use of herbicides. A few ideas relating this statement as follows,

-- It is very likely that through the Commission Communication, COM(2002)179 final of 16 April 2002 "Towards a Thematic Strategy for Soil Protection", which is currently under debate in the European Parliament, conservation agriculture will consistently be widely extended/ adopted through out Europe. In a separate file please find some information on conservation agriculture and on the European Conservation Agriculture Federation (ECAAF), entity which subscribe this proposal/ comments. **Conservation Agriculture (CA)** refers to soil management practices, which minimise the disruption of the soil's structure, composition and natural biodiversity thereby also minimising erosion and degradation, and water contamination. Direct sowing, minimum cultivation and cover crop / crop residues systems are examples.

Regarding the use of herbicides in CA:

-- Generally, in CA the use of herbicide is much more friendly to the environment than in conventional agriculture, due to:

1) In CA there is no use of soil- acting herbicides. In another words, pre-plant incorporated (PPI) or soil- applied preemergence herbicide (PE) are NOT used (or much less used) in CA.

2) Therefore, in CA only postemergence herbicides (POST) are used. Consequently, herbicides residues in soil are drastically reduced.

3) Generally, POST herbicides has lower ecotoxicological indexes than PPI and/ or PE herbicides. As an example, glyphosate and gluphosinate are two herbicides likely to be used in CA, in comparison to atrazine/ simazine (PE) or trifluraline (PPE) widely used in conventional agriculture.

4) Herbicide difusse contamination of surface water is also consistently reduced in CA in comparison with conventional agriculture. This is due to have much less soil erosion/ sediment runoff and higher water infiltration in the soil profile in CA than in conventional agriculture.

4) Generally, herbicide degradation by microbial organism is very quick/ rapid in CA as compirison to conventional agvriculture. This is due to the higher crop residue/ organic matter content in CA.

5) The previous commented chararacteristics explain why herbicide residues in foods and water in CA are less likely to be deteted.

Please find several attached files:

a) On soil protection, conservation agriculture and ECAAF

b) An article titled "Used of herbicides and agri-environmental measures", which I published in the journal AGRICULTURA, Madrid 2001, páginas 665-66, in Spanish (my own specialty is herbicides/ weed science, working over 30 years for the public research organisations).

c) By separate mail I send you two publication edited by ECAAF, in which there are important reference / articles on the use of herbicide in CA in comparison to conventional agriculture.

Sincerely,

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