

SUSTAINABLE USE OF PESTICIDES

I am writing to express my individual concern over two regulatory initiatives that will result in far fewer pesticide alternatives for EU farmers. The remaining products may have safer profiles, however they may be short lived. With few or no products to rotate, pests will likely develop resistance and the ability of EU farmers to economically produce and protect crops may be lost.

1. It is estimated that the EU re-registration process will remove over 50% of the currently available crop protection products. Some are older products that do need to be removed but many will be dropped because the cost of the re-registration is not justified. This will be particularly acute in smaller EU markets such as insecticides and on minor crops. The EU should strive to keep at least three different classes of products available for each pest/crop complex.

2. The new EPPO Resistance Management Guidelines are also of concern. The costs of developing and maintaining susceptibility data on pests for each country will likely result in companies labeling for only the major pests and crops. This will also limit product diversity and put the few legal products under a high risk of losing efficacy due to resistance development, which is the opposite of the intent of the guidelines. The EU should again encourage adequate product diversity in the implementation of the guidelines.

I have been involved with resistance management for twenty-five years and feel that product diversity and education at the grower level is the key to success rather than regulations. I and most in industry support the intent of these two regulations to promote safer crop protection products but if some product diversity is not maintained, pest resistance will become more, not less of a problem. I hope you will consider the above viewpoints in your final recommendations on the Sustainable Use of Pesticides.

Gary D. Thompson, Ph.D.
Chair, IRAC International
New Product Development
Dow AgroSciences
Indianapolis, IN

gdthompson@dow.com