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Commission Communication on the sustainable use of pesticides

Dear Mrs Hellsten,
Dear Sir, Madam

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

As a scientist and agronomist who has dedicated most of his career to developing and applying crop protection products, I believe there are a number of elements of this strategy that need to be further considered, and I hope that my letter to you will convince you that a reduction in the use of pesticides is not a feasible method for achieving sustainable agriculture in Europe.

The aim of policy on use of pesticides is to avoid any risks to or impact on human health and the environment. At first glance, it may appear that an arbitrary use reduction, by 50% for example, is a simple means of reducing risk. However, this is not the case. The reduction of a certain volume or by the number of application does per se not mean a reduction of potential risks. The intrinsic activity of a low volume and a high volume product might not be comparable. A higher number of applications which are more targeted might have less unintended side effects than a lower number of applications in the same crop

The most effective way to reduce risks associated with the use of pesticides is to use these products appropriately. Improved application technology, regular inspections of equipment, improved user education and the adoption of integrated techniques such as Integrated Crop Management (ICM) and Integrated Pest Management (IPM) are all ways of ensuring that the type of chemical control chosen is appropriate and used as sparingly as possible.

Any imposed use reduction programmes do not consider qualitative aspects of pesticide products like their environmental properties, and thus are not in accordance with the principles of Integrated Pest Management and Integrated Crop Management. It is a fact, however, that there has been a reduction in the amounts of pesticides used in the EU over the last ten years. But this is thanks to technological innovation, novel chemistry and improved application technology; moreover, the review of existing active substances as laid out in EU Directive 91/414/EEC is contributing to the further withdrawal of pesticide products from the market.

An arbitrary restriction on the use of pesticides (quantitative by volume or number of applications) could have serious repercussions on both the farming sector and the economy in general. There could be job consequences, income losses for the farming community, deterioration of food quality and affordability, and the necessity to use more land for agriculture. Arbitrary use reduction measures should thus not become part of the envisaged Thematic Strategy nor of national risk reduction programmes.

I believe that it is not in the consumers interest to move production of agricultural produce and food out of typical growing regions in Europe by implementing use reduction concepts. A

further improvement of the application through advanced concept should instead be promoted.

I hope that you will take all of my above points into consideration and I look forward to a fruitful and workable strategy for the sustainable use of pesticides in Europe.

With kind regards,

A handwritten signature in black ink, reading "Joël Kabe". The signature is written in a cursive style with a long, sweeping underline.