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Comments to the “Thematic Strategy on Sustainable Use of Pesticides”

Dear Mrs Hellsten!

Following the Stakeholder Conference held on 4 November 2002, I would like to express my thanks for organising the event, for giving the opportunity to a large audience of stakeholders to exchange views, to discuss and to give input into the Commission's future activities with regard to Plant Protection Products.

In addition to the remarks contributed during the event, please let me stress some of my thoughts, concerns and recommendations with regard to the “Thematic Strategy on Sustainable Use of Pesticides”:

First of all: Concerns for human health are of vital importance, and so are concerns regarding the quality and conservation of our environment, of soil and water quality, of biodiversity and other assets. Accordingly, it is more than legitimate to evaluate and – where ever possible – reduce or minimise risks being imposed onto these assets.

However, evaluating risks must go along with an evaluation of the risks of potential alternatives, and it must go along also with an evaluation of the according benefits. Or in other words: The risk associated with doing certain things has to be compared with the risk of not doing these things. With regard to pesticides, the Danish scientist Bjørn Lomborg (Lomborg, 2001: *The Sceptical Environmentalist*. Cambridge University Press, Cambridge) states that recent research indicates that pesticide use causes very little cancer. On the contrary, the abolition of pesticides indeed would lead to more cases of cancer. According to Lomborg, fruit and vegetables help to prevent cancer. However, when being produced without pesticides, fruit and vegetables would become more expensive, and accordingly people would consume less. Whereas today about 20 deaths in the US per year can potentially be interpreted as due to pesticide use, a reduction of fruit and vegetable consumption in the US by only 10 percent would lead to an additional 26.000 people probably dying of cancer.

I am aware that dealing with such numbers of deaths and/or potential deaths might be considered cynical. However, from my personal point of view, it would even be more cynical to ignore such scientific findings, to refuse looking at them, refuse debating them and – if necessary – draw adequate conclusions from them. As the reaction of one particular

participant on the podium of the Stakeholder Conference has shown, there is massive refusal to look at, debate and possibly accept these data. When Lomborg published his book "The Sceptical Environmentalist", his work was either massively attacked or ignored by many "environmentalists", whereas he received great approval and support from many scientists. Whenever the book was attacked, and Lomborg had a chance to answer, his answers proved that his critics in general failed to make their points. (For minor corrections and the debate about his book, see www.lomborg.org and www.greenspirit.com/lomborg). It is one of Lomborg's major points that indeed further improvements with regard to the environment are necessary. However, when trying to improve things, we should look where we can achieve which improvements at which costs.

As additional remark: Lomborg was appointed director of Denmark's national Environmental Assessment Institute in February 2002!

The title of the document presented by the European Commission (Com(2002) 349) "Towards a Thematic Strategy on the Sustainable Use of Pesticides" and also the title of the Stakeholder Conference of 4 November 2002 imply that there is a need for Plant Protection Products (PPPs) and that this need is generally accepted. If that is correct, the focus must then turn to questions such as user safety, consumer health, environmental effects etc. – and so must lead to a concept of optimised and responsible use.

That line of thought then points to an overall concept and to the vital role which crop protection plays in crop production in general. Integrated Farming, as presented in the EISA Codex in 2001 (European Initiative for Sustainable Development in Agriculture, 2001: A Common Codex for Integrated Farming, Bonn, see: www.sustainable-agriculture.org) for example is such an overall concept. A vital part of this concept is Integrated Pest Management (IPM), and another vital part are indicators to measure "the state of the world" and possible progress, respectively (see Christen, 2002: Indicators for a Sustainable Development in Agriculture. Vol. 3/2002 of the ilu series, Bonn, German publication, and "Conclusions and Recommendations", available in English via ilu@fnl.de).

However, and this is the second point I would like to make, Integrated Pest Management can only be a success if all cultivation practices from tillage, variety choice, seeding and fertilisation to crop protection – including sufficient different chemicals for crop protection – are available in the "tool-box", and if benefits and risks/costs of all alternatives are balanced responsibly. Recent research published by the Federal Biological Agency (BBA, see www.bba.de, follow the buttons/links "Presse Information" and "24.10.02 Im Langzeitversuch bewiesen") in Germany reveals: "Therefore we cannot generally suggest to the farmers to apply only half the amount in future. However, the trials clearly show that there is an enormous potential to save [PPPs] over the years, but the farmer has – as usual – to look at the conditions on his field."

A strategy aiming at a one-sided reduction of PPP's is counterproductive with regard to consumer protection, resistance management, resource use, economic results of farming etc. Accordingly, the efforts must aim at an optimisation of PPP use rather than anything else. Acceptance of a sound system of IPM could – and would – lead to benefits in all three pillars of a sustainable development: sufficient, affordable and healthy food, less uncertainty on the side of consumers, areas to be spared for nature conservation, and economic chances for the farming community. I think it would be worth the effort to start looking at PPPs with such "sustainability glasses".

Harmonisation with regard to registration, use, monitoring and residues – i.e. food quality – on a high level is one necessary step towards IPM as a generally accepted and applied guideline for plant protection throughout Europe. It must adequately take care of consumer

health and environmental effects on the one hand and agricultural needs on the other – as the growing gap of available PPPs in Germany dramatically reveals.

“Thematic Strategy on the Sustainable Use of Pesticides” has been the headline and motto of this discussion process. I hope that we will commonly achieve a big step away from ideological debates towards a truly sustainable use, a use which is optimised through IPM, which is monitored, and which is altered for the better if found necessary, but which is not reduced at “what ever the price might be” due to the lack of properly balancing benefits and risks.

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A handwritten signature in black ink, appearing to read 'A. Frangenberg', written over the printed name below.

Dr. Andreas Frangenberg