

By e-mail to:
Eva Hellsten,
European Commission,
DG Environment,
Chemicals Unit

Comments on the Commission Communication – Towards a Thematic Strategy on the Sustainable Use of Pesticides.

This letter contains joint comments from the National Chemicals Inspectorate, the Swedish Board of Agriculture and the Federation of Swedish Farmers. Their purpose is to express views based on experiences gained in the work with national risk reduction programmes on pesticides in Sweden.

We welcome the Commission initiative and the opportunity for us to provide the following written comments on the communication.

In general, we share the views and support the measures proposed by the Commission. However, there are some fundamental principles we believe are essential to a successful thematic strategy and a sustainable use of pesticides.

1. We note that the thematic strategy is intended to complement the existing legislative framework on pesticides, by targeting the use-phase of these products. To achieve changes in pest management in favour of sustainability and reduced dependency on pesticides, we find it necessary to use both regulatory and voluntary instruments. We therefore stress the need for another approach where the thematic strategy is not only targeting the use-phase, but instead constitutes the overall framework for sustainability and risk reduction regarding pesticides, including also the regulatory aspects. The community legislation on plant protection products, in particular Council Directive 91/414/EEC, should be seen as a part of this strategy.

2. We underline the importance of the voluntary aspects in the strategy. Extension service, education and information are important elements for creating understanding and acceptance of different measures. Increased knowledge among farmers also makes it easier to take advantage of new techniques and methods, which can promote integrated and need based crop protection. (Extended use of pest forecasting and warning methods, reduced dose rates and safe handling of pesticides are examples of what can be achieved.)

Furthermore, we want to highlight the co-operation between the authorities, and between authorities and relevant non-governmental organisations, in the case of Sweden e.g. the Federation of Swedish Farmers. This is one of the most important factors that have contributed to the success of the Swedish risk reduction program. The program contains several activities performed at different levels (local to national) and driven by different organisations, for example the farmer's associations, the agricultural industry, authorities and research institutions.

Examples of initiatives to activities from other stakeholders are:

- The voluntary information campaign “Safe Pesticide Use” which was launched by the Federation of Swedish Farmers in a joint collaboration with the Crop Protection Industry, the Board of Agriculture, the Chemicals Inspectorate and the Environmental Protection Agency.
- The introduction of different certification systems by some companies in the agricultural industry where farmers have to fulfil a certain standard regarding the use of pesticides etc.

Such activities have raised the awareness of environmental issues among farmers. It is often much easier to reach acceptance for different measures if the initiatives also come from the farmer’s associations and the agricultural industry. This also points out that farmers and the agricultural industry take responsibility for environmental and health issues. It is also in line to the principle of sector responsibility.

Co-operation together with the initiatives and responsibility taken by others than the authorities have facilitated the work with the programmes. We feel that these factors should be given a more prominent place in a future strategy.

3. However, we are of the opinion that the Directive 91/414 and the suggested strategy presently are setting some barriers for regulatory initiatives aiming at a sustainable use of pesticides. The thematic strategy opens possibilities to limit unsuitable ways of using pesticides, for example aerial spraying. This is good but not enough. In our opinion there is also a need for a possibility to reduce the overall chemical load or treatment frequency by regulatory means in order to overcome market forces in favour of sustainability in food production. Therefore there is a need for coherence in the development of the thematic strategy and the revision of the Directive in order to contribute to sustainable use of pesticides. Examples of these barriers are explained in the following section.

Recent reports from member states having reliable statistics on pesticide use show a limited but clear increase in the treatment frequency during the latest 5-10 years. These reports reflect an increased dependency on chemicals in plant protection. Treatment frequency is also related to the number of exposure situations when operations such as loading, mixing and cleaning of sprayers occur. Several investigations have shown the importance of these operations in relation to unintentional exposure of operators and the environment (surface water and groundwater). Therefore, a risk element can also be seen in this context. To counteract the increased dependency on pesticides is, according to our view, one of the biggest challenges we have to address in future food production. We are also convinced that this development cannot be changed by voluntary actions only, since the decisions concerning different inputs in agricultural production including the use of pesticides are highly dependent on the market forces and the agricultural policy.

At the present, an application for approval of a plant protection product cannot be rejected on the basis that the consequences of its use will increase the overall dependency on plant protection products. Instead, such regulatory actions may be in conflict with the Directive 91/414 if acceptable uses have been identified for the product and substance concerned, according to present criteria. A typical example is the use of soil disinfectants. The use of these pesticides eliminate the need for farmers to develop preventive plant protection practices such as crop

rotation, use of resistant crop varieties and to avoid cultivation of susceptible crops in infected areas. Perhaps the use of soil disinfectants do may perhaps not comply with the principles of good plant protection practice and the principles of integrated control as provided for in Article 3 (3) of the Directive. However, this article is rather weak when it comes to member state's possibilities to reject an application. The directive is limited to the placing on the market of individual products that can fulfil specific criteria. It does not regulate the uses as such.

To achieve an effective thematic strategy contributing to a sustainable use of pesticides, the following amendments must be made in the community legislation on pesticides;

- Remove regulatory barriers for member states to adopt policies aiming at reduced dependency on chemicals by regulatory means.
- Include comparative risk assessments and substitution of plant protection products by safer alternatives (including non-chemical methods).
- Make the application of the precautionary principle more operational, for instance by introducing strict and primarily hazard based inclusion criteria for active substances.
- Increase the possibilities to take into account realistic conditions (including improper use) in the risk assessments.

4. Finally we would like to point out that the activities and measures needed for a rational risk reduction plan may vary a lot between member states. Each member state must therefore be given the opportunity to develop a national plan based on national conditions and their own specific needs. It is also important to clarify the divisions of responsibility between the Commission and the member states.

Finally, we encourage voluntary mutual recognition of approvals between Member States, in particular regarding the area of minor crops.

We are of course prepared to assist you with further information on the national risk reduction programmes on pesticides in Sweden or any on other question you may have regarding this letter.

Yours sincerely,

Peter Bergkvist
Principal Scientific Adviser
National Chemicals Inspectorate
P.O. Box 1384
S-171 27 Solna

Else-Marie Mejersjö
Head of Plant Protection Unit
Swedish Board of Agriculture
S-551 82 Jönköping

Anette Hellström
Director
Federation of Swedish Farmers
S-105 33 Stockholm