

Dear Mrs Hellsten,

As one of the original members of the Insecticide Resistance Action Committee (IRAC) I have been working on insect resistance issues and management for nearly 20 years.

I would like to voice my concern that the ability to manage insect resistance will be severely constrained after completion of the European and Member State re-registration programmes with the subsequent loss of products and product diversity. If resistance starts to occur widely then sustainable use of pesticides will be compromised.

The analogy of the toolbox provided by Mr Paul Leonard, at your recent meeting, is very appropriate as farmers will have little practical alternative (or tools) other than to rely on the few products and uses that survive the re-registration process. This will place proportionately greater selection pressure on the remaining products and use patterns and accelerate the risk of resistance development.

One of the basic principles of resistance management is to use products with different modes of action in rotation, so that the challenge to the pest population is diversified and the risk of resistance to a particular chemistry or mode of action is avoided or reduced. As you may be aware, under the EC Directive 91/414, registrants of products now have to make a risk assessment to estimate the risk of resistance occurring to their product and to propose strategies to avoid this happening. Without a diverse selection of chemistries and modes of action to choose from this will be difficult or in some cases impossible even when the use non-chemical tactics are incorporated into the strategy.

Kindly give this need for product diversity and resistance management your due consideration when developing "the Thematic Strategy on the Sustainable Use of Pesticides"

Yours sincerely

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