

January 6, 2003

Mrs Eva Hellsten
Head of the Chemicals Unit
Environment DG, European Commission
Office BU-5, 02/01, B-1049
Bruxelles/Brussel
BELGIUM

Dear Mrs. Hellsten,

I write to provide feedback on the. "Thematic strategy on the sustainable use of pesticides, Com(2002)349" as indicated on you web site,

<http://europa.eu.int/comm/environment/ppps/home.htm>

By way of introduction, I am a professor at Michigan State University and have been actively involved in resistance research around the World for many years. I am also responsible for the Pest Resistance Management Newsletter with a circulation of over 2000 resistance workers and policy makers globally. If you would like to receive copies of this Newsletter, just email me your request, and I will see that you are on our subscribers list. We also host a website for the Arthropod Resistance Database, an up-to-date and reliable database which is currently becoming interactive (www:cips.msu.edu/whalonlab). We should have the next version up sometime in March of 2003. The Newsletter and Database are supported by a joint consortium of government, policy and private sector donors.

My research and extension work has enabled me to collaborate with resistance experts in various European universities, governmental organizations, advisory services and crop protection companies. As such, I have become aware of a number of challenging resistance problems that have developed in the region, some of which we also face here in the USA, and other parts of the world.

One of the common issues facing research and extension workers tackling these resistance problems is often the lack of available practical and economically viable pest control alternatives. Indeed, this is the reason for my feedback on your initiative to develop a sustainable thematic strategy for sustainable use of pesticides. As I understand the situation, namely that there will be a significant reduction in the number and diversity of crop protection products available on the European market following de-registration of unsupported compounds from June 2003. Based on information provided in Document Sanco/2692/2001 of 25 July 2001 (Report from the Commission to the European Parliament and the Council, page 39) the Community will lose greater than 50% of the currently registered active ingredients.

I also understand from the abstract by Paul Leonard (Managing Resistance for Sustainable Use of Plant Protection Products) that it is estimated that up to 60 or 70 per cent of target pests and crops could be lost from product labels, for those products that make it through the EU system, at a member state level. As indicated in the abstract, these are just estimates and are therefore difficult to validate. However, a loss of this magnitude is likely to have a significant impact on the diversity of products available for resistance management.

Should sufficient diversity of products (especially modes of action) not be preserved, the inevitable consequence will be to accelerate resistance development to those that

remain registered. As a researcher who has dedicated much of my life to the subject of resistance management, I am therefore keen to provide this feedback. I would therefore encourage all stakeholders, including policy makers, to recognize the impact that such a change in the resistance management toolbox could have, and to act accordingly. To be more specific, it would be advisable to ensure that sufficient products remain available for use against current pest populations which have a minimum diversity of chemical types and modes of action available. The level of diversity required is difficult to prescribe as this will vary with the ability of each pest species to develop resistance, operational factors and the crop environment, but as a general rule, a minimum on three modes of action should be preserved.

Finally, I urge stakeholders and policy makers in the EU to remember that resistance management is an essential component of integrated management systems. Without due regard for the principals of resistance management, IPM programs may not be sustainable and are likely to succeed in accelerating resistance development to those IPM compatible products and use patterns upon which these programs depend.

Sincerely,

Mark E. Whalon
Dept. of Entomology and
Center for Integrated Plant Systems
Michigan State University
East Lansing, MI 48824