



European Economic and Social Committee
Public Hearing on Integrated Production
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Who is PAN Europe



Pesticide
Action
Network
Europe

- PAN Europe is one of the 5 centres of PAN International
- 32 not-for-profit members in 24 European countries
- Bring together health, environmental & women associations
- Working to replace use of hazardous pesticides with ecologically sound alternatives
- Brussels based with 4 part time employees

The interesting points in the EESC draft:



1. **The timing of this report is perfect:** 26 November 2014 : Commission submit report on NAP implementation to EP and Council (SUD, art. 4.3)
2. **The idea of asking the European Commission to analyse the production model** (point 2.1; point 5.2.1 and point 5.2.3) is good as well as
3. The statement, saying that ‘Although **certain classic elements of integrated production are being gradually turned into obligatory farming practices, this must not alter the voluntary nature of the integrated production system**’ (point 5.4.2), but depending on baseline

Some of the critical points in the EESC draft:



1. **IP defined** as exchange of knowledge and introduction of new technology such as precision farming (incl. point 2.2; point 3.2; point 3.4; point 3.5 and point 3.6)
2. Sector **specific guidelines on IP** to be inspired by EISA/AREFLE (point 4.3), and
3. Calling on the need for a **EU logo** (point 1.5)

Instead we should rather build on the Sustainable Use Directive (SUD) to start defining mandatory minimum IP levels



The SUD: IP(M) a system approach, engaging both farmers and MS

“professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available for the same pest problem , and

“Member states shall take all necessary measures to promote low pesticide-input pest management and organic farming, giving wherever possible priority to non-chemical methods”.

Mandatory parts (annex 1, point 1):

- crop rotation,
- use of adequate cultiv. techniques
- Use of resistant/tolerant cultivars
- Use of balanced fertilisation
- Protection of beneficial organisms

Provide information and tools for pest **monitoring and decision-making**, as well as **advisory services on integrated pest management.**” (Article 14(2))

Establish **appropriate incentives** to encourage professional users to implement **crop and sector-specific** guidelines for integrated pest management on a **voluntary** basis.”
Article 14.5)

The mandatory elements of IP(M) that farmers need to apply must be defined:

- MS to report to SANCO by June 2013 on to implement IPM as from 1 January 2014 (SUD article 14.3)
- The SUD is still not part of cross compliance, but member states recognise in their National Action Plan (NAP) that this has to be done

e.g. NAP of Czech Republic:

By 2015 the MoA and the MoE, in cooperation with the SPA and CEI, shall harmonise the systems of measures for agricultural activity limiting the risk to the environment in the context of supports and controls by the MoA, in particular the control conditions in the framework of cross-compliance and the standards for maintaining a good agricultural and environmental condition (GAEC) with the measures for compliance with the general principles of integrated pest management.

The voluntary measures of IP, currently in CAP

Country/ Region	Instrument	What	Amount €/ha
IT/Emilia Romagna	F&V CMO	use of selected pesticides combined with an integrated production system	€100 (arable) €300 (vegetables), €550 (fruit) per hectare
Austria(*)	Agro-envir. in Rural Development	crop rotations (annual crops), restrictions on fertiliser and pesticide use, training and record-keeping	€150/ha (potatoes and turnips), €250/ha (strawberries), €300/ha (fruit and hops), up to €400/ha (vines)
France	AE	biological control agents, introduction of beneficiaries, sexual confusion	64€; vegetables: 105€, fruit trees: 70 €; grapes: 79€
Belgium (Flandre)	AE	sexual confusion against the codling moth in pipfruit (max 5 years)	250 €
Luxembourg	AE	biological control agents to fight <i>Cochylis</i> et <i>Eudemias</i> on grapes	120 or 200 €/ha depending on the exact intervention needed

* MS offering special IP support on RDR include AU, CY, CZ, EE, DE, HU, IT, LT, PO, SI, SL, ES

Many MS upgrade their IP(M) system on alternative technique to comply with SUD:

- **Austria:** confirms continuous support to crop rotation,
- **Finland:** increased attention to crop rotation in RDR
- **UK:** environmental Stewardship Schemes - with financial support for under-sowing spring cereals, use of winter cover crops) and 6m or 12m buffer zones to protect watercourses.
- **Bulgaria:** ban use of any pesticide on protected territories, pasture and meadows
- **Slovenia:** increase number of sector specific guidelines (cereals)

e.g. **Slovenian NAP:**

an appropriate crop rotation should also be considered (e.g. in arable farming, 5-year crop rotation), fertilisation should be applied only on the basis of soil analysis and detailed records of all operations carried out should be kept

The SUD must slowly ensure better surveillance, guidance + statistics (SUD art. 14.2)

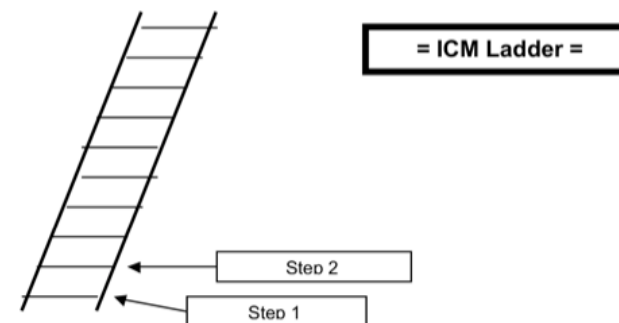
- **Bulgaria:** pest **diagnosis**, **bulletins**, establishment of national data base on pests, and to develop **mathematic simulation models**
- **Slovenia:** **decision support system** will be upgraded to inform also about **alternatives**
- **Slovakia:** sector specific guidelines to be based on **IOBC** (though still many loopholes)
- **Finland:** **mandatory reporting** to MS on pesticides use

At the same time it is mandatory in both CAP and SUD to establish Farm Advisory Systems, informing on IPM

MS are slowly starting to define alternatives as success indicators

- **Estonia:** ‘Economic indicator ‘**increase the percentage of users** who apply biological control plant protection products and alternative pest management techniques’
- **Lithuania:** One of two ‘economic indicators’ is: Increase in the **number of registered biological plant protection products**
- **Spain:** Success indicators number of demonstrations and dissemination activities undertaken and the **number of hectares of agricultural land and woodland using alternative pest control systems** (mass trapping, sterile insect technique, biological control or chemical sterilisation, etc.)

BUT...we are only at the beginning of the IP ladder towards sustainable agriculture



Adoption of pest control methods in a sample of 571 UK arable farms during the 2007 cropping season

Used by 50% or more farmers	Used by 20-35%	Used by less than 10%
Crop rotation	Some element of mechanical weed control	Using pheromones to monitor pest levels
Improved field margins	Flower strips to encourage natural enemies	Sowing a mixture of crop cultivars in the same field
Timing field operations to reduce risk of pest, disease or weed problems	Beetle bank strips in large fields to shelter ground predators for aphid control	Introducing predators for pest control
Sowing disease or insect resistant varieties		Using pheromone traps to control pests
Hand pulling problem weeds		Using trap crops to attract pests away from the cereal crop
Sowing different cereal varieties in different fields		
Spot spraying		

Source: Overcoming market and technical obstacles to alternative pest management in arable systems. Rural Economy & Land Use Programme Policy Note 10. Oct 2009 (www.relu.ac.uk)

My conclusion:

1. It's a good idea to define minimum acceptable IP rules.
2. Or, as IP is a dynamic approach to farming maybe better to define what is not IP.
3. Need to build on the SUD, rather than developing an EU regulation of integrated production:
No need to reinvent the wheel

Thank you for your attention

