

PAN Germany
welcomes
the programme
explicitly!

However, there are two sides of the coin.





The pros

- The fact that there is a German reduction programme
- It has been developed in a participatory process
- It has been developed in an acceptable period of time
- The structure is clear and evident
- It includes targets, indicators and a good list of instruments
- It is accepted by important stakeholders
- It is accepted by the agricultural ministers of the Federal Länder who in March 2005 set the target to reduce the use of plant protection products by 15% within the next 10 years.



The cons

- Only a single (very conservative) time limit set
- No additional money
- A key instrument to strengthen advisory services will strongly (and even more than currently) be in the hands of the pesticide industry
- The programme is not sufficiently dedicated to the precautionary principle
- Only one clearly defined target

Indicator		Tar
	Residues in food	\Rightarrow
	exceeding MRI s	

「**arget** ⇒ To be reduced to < 1%

(= infringements against food legislation)
(= anyway task of a government)

Treatment frequency

Agricultural ministers of the Federal
Länder decided to reduction the use of plant protection by 15% within 10 years
– what does this precisely mean??

Risk indicator ? Not available. No target defined. Difficult.



PAN Germany is monitoring the implementation of the programme at (at www.pestizidreduktion.de)

The monitoring indicators are:

The indicators of the reduction programme

- % of food samples with residues above MRL
- treatment frequency index

plus

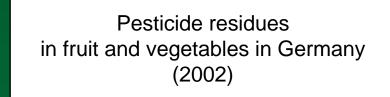
- food samples with residues detected

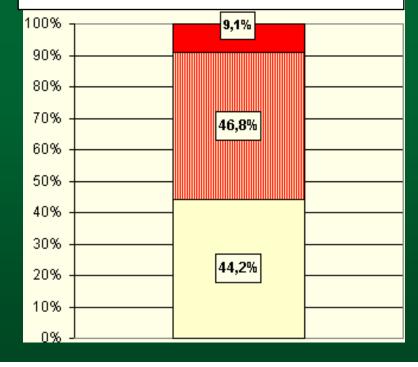
plus

- % of food samples with multiple residues
- pesticide residues in surface water and ground water

Why this broader view?

More than 50% of the (nationally grown and imported) fruit & vegetable samples taken in Germany contain pesticide residues



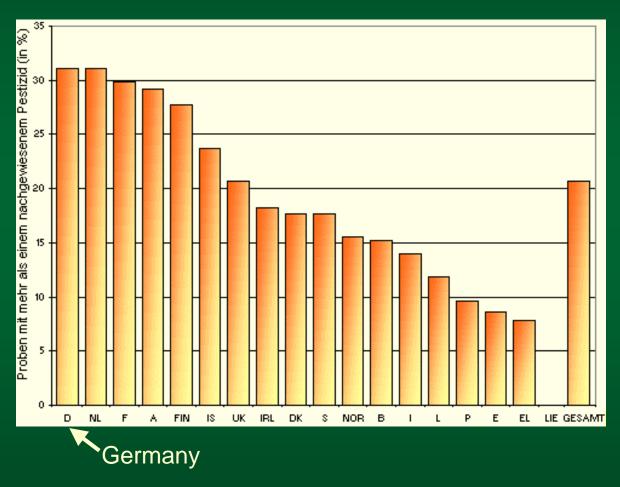


Residues > MRL

Residues at or below MRL

No residues

Almost every 3rd (31,1%) food sample taken in Germany contains multiple residues*



* Samples with residues of more than one pesticide in fresh (incl. frozen) fruit, vegetables and cereals, sum of surveillance and follow up enforcement sampling (EU monitoring report 2002, April 2004)

Conclusion

- PAN Germany welcomes the fact that there is a programme.
- However, from our point of view the philosophy of the programme does not go far enough beyond targeting infringements against legislation.
- Serious problems are not dealt with (e. g. multiple residues).
- The programme mainly aims at the most evident emergency issues (e. g. hot spots, infringements against legislation).

Therefore it presumably can not be expected that the programme will lead to a change of the plant protection system which then could fully result in an implementation of the precautionary principle.

The potential of the programme will depend on:

- governmental will (!)
- voluntary stakeholder contributions (e. g. food companies)
- pressure and contributions from NGOs
- the shopping list of consumers

