The German „Reduction Programme Chemical Plant Protection“ from the PAN Germany point of view

Carina Weber
Pestizid Aktions-Netzwerk e.V.
www.pan-germany.org
PAN Germany welcomes the programme explicitly!

However, there are two sides of the coin.
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.
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

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Target</th>
</tr>
</thead>
</table>
| Residues in food exceeding MRLs | To be reduced to < 1%
                               | (= infringements against food legislation)                          |
| Treatment frequency        | (= anyway task of a government)                                 |
| Risk indicator             | ? Agricultural ministers of the Federal Länder decided to reduction the use of plant protection by 15% within 10 years – what does this precisely mean?? |
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.
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