

Statement on the EC regulation concerning the placing of plant protection products on the market and the EC directive establishing a framework for Community action to achieve a sustainable use of pesticides*

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* The positions expressed in this statement are not necessarily the official positions of the BBA

The New Regulation

Revised Directive 91/414 more binding effect as EC regulation

Important: Separation of EC regulation regulating authorisation of pesticides from EC directive regulating usage of pesticides

European registration authority for pesticides unifies process of pesticide registration. Duplication of administrative work at EC and Member State level?

Definition of **authorisation zones** will simplify the mutual acceptance of registered pesticides

Preliminary pesticide registration (for 3 years) will change. The pesticide industry fears disadvantages, especially the loss of competitive advantages, as a result of the three-year reduction of patent protection

Comparative risk assessment and **substitution principle** will reduce number of highly toxic pesticides

→ more innovation in plant protection research

→ Problem: list of candidates

Definition of Integrated Pest Management (IPM) and Good Plant Protection Practice (GPP) do not improve understanding of IPM and GPP

Are not clearly distinguishable from each other

Definition for GPP nonessential because the term is not used in new EC documents

The New Directive

Development of framework agreement for sustainable usage of pesticides aims to significantly reduce the overall use and risks of pesticides
it does not specify special indicator for pesticide use reduction, such as a treatment frequency index

Article 4: Adaptation of **national action plans** promotes unification of plant protection strategies in sense of IPM

Article 5: The specified **training** requirements are insufficient.

Article 13: Formulation of **general standards for IPM** at the EC level and their **mandatory implementation** starting in 2014

Unfortunately, crop-specific standards shall be adapted voluntarily

But, farmers are able to adapt general standards and crop-specific standards

How high will these standards be?

IPM requirements will be linked with financial incentives

Risk that **IPM requirements may be formulated on too low** a level.

Therefore key requirements must be implemented

Article 14: Use of **risk indicators**.

Degree of harmonisation in Europe?

German experts prefer national evaluation models, also national hot-spot management