

PAN Europe

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Points of concern regarding the EC Management Strategy for the Phase-out of Critical Use Exemptions of Methyl Bromide 9 March 2006

Summary

1. The EC strategy was produced as a result of a requirement of Montreal Protocol (MP) Decision Ex.I/4 which requires all countries that request CUEs to submit a management strategy for the phase-out of MB containing, for example, “expedited procedures in place to... deploy alternatives”, and “show how the ... strategy will be implemented”. But the present EC strategy fails to do this and only presents possible measures, no implementation plan, no concrete measures.

2. In technical terms, the EC strategy is excellent and contains very good background information about the phase-out progress in Europe and current uses. It successfully indicates which are the countries and the crops still using methyl bromide and a number of measures and alternatives that if implemented would phase-out methyl bromide to residual levels in Europe.

3. However, there is lack of concrete commitments or clear statements about what EC and MSs will actually do to phase-out MB rapidly. In this sense the EC strategy does not yet meet the criteria in Decision Ex.I/4. The text gives lots of very good examples of what has been done, and what could be done, but does take the next step of saying what they will do in 2006 and 2007. A timetable, action steps and practical measures are missing.

4. An important policy measure (commitment) that could be implemented at MS level is to require permission before each MB fumigation is carried out. The permission should be treated on a case by case basis and backed by the results of pest monitoring (to identify pest species and level of infestation) and assessment of whether alternatives are available to control that specific pest problem. A “prior permission” system should be adopted in both soil sector and postharvest sector.

The strategy mentions an example from Belgium. In 2005, Belgium introduced a system requiring specific approval before each soil fumigation, based on pest identification. As a result Belgium used about 70% less MB than they expected.

During the phase-out in the Netherlands, as early as the 1980s, they also introduced a system requiring permission prior to each MB use for soil fumigation, and this had a big impact in reducing MB use.

5. The EC report refers to both chemical and non-chemical alternatives (like grafted plants, resistant varieties, etc) with similar importance and without ever questioning the hazards of some chemical alternatives. Yet, many of the chemical alternatives referred in the text are acute toxic, carcinogenic, potential groundwater contaminants, etc.

Iodomethane, for example, is referred as being tested in Spain as a MB substitute. This substance is carcinogen and registration as a substitute of methyl bromide has recently been refused by US EPA on the grounds of its carcinogen properties. The California department for pesticides found the levels of the substance present in air drift too dangerous for applicators and residents. This substance is not yet up for registration in the EU but others, for example, 1,3-D, metam sodium, are up for registration and, like MB, are acute toxic.

We all agree that it is urgent to stop the damage to the ozone layer (impacts on human health, fish stocks, agriculture etc) so the phase-out of MB is the first step forward. The next step should be to put in place more sustainable alternatives in the medium and long-term. This should be dealt with in a separate report/strategy and addressed in any future revision of the EC strategy. PAN Europe is totally available to give input in any of the cases.