Pesticide Action Network Europe

Briefing:
New EU plant health regime: more resilient agricultural systems - the way forward

'an agro-ecological approach to pest management and action to reduce dependence on harmful pesticides by means of strong IPM programmes[1]'

The 2008 UN International Assessment of Agricultural Knowledge Science & Technology for Development (IAASTD) report, endorsed by 56 countries

In May 2013, the European Commission published a package of measures to strengthen the enforcement of health and safety standards for the whole agri-food chain and, as part of that, a proposal for the new plant health package. The purpose of the upgraded EU plant health regime is to combat new pests from establishing themselves in EU territory, as well as to reduce the risk of pests spreading once established within the EU[i].

The approach taken in the plant health regime is wrong: The EU model of agriculture is more and more often based on vulnerable, unhealthy and not robust agricultural systems containing sensitive varieties, very limited crop rotations (if any at all), a lack of beneficial organisms, and biodiversity declining in general. That makes relatively easy for exotic plants and animals to establish themselves as there is almost no resistance.

Prevention rather than cure: In the impact assessment it was explained that: *'In agriculture, the introduction and spread of new pests and diseases nearly always leads to an enhanced use of pesticides so as to maintain previous production levels.'* But this is only the case for vulnerable systems entirely dependent upon synthetic pesticides.

PAN Europe's position in a nutshell:

PAN Europe welcomes the proposals for better, and more, surveillance, both at EU borders and at farm level. We also think more enforcement of rules is necessary for risky activities such as importing tropic plants (such as bamboo) and recovery products (such as tyres), to prevent unwanted plants and animals entering the EU.

In addition, PAN Europe accepts the idea of early eradication of outbreaks of new pest species as long as this is done in a sustainable way and not primarily using synthetic pesticides, and as part of an overall strategy elaborated at EU level which builds on the general principles of sustainable use, as defined in Directive 128/2009/EC on sustainable use of pesticides.

Furthermore, PAN Europe seriously questions the logic of the International Plant Protection Convention (IPPC), which considers only the economic aspects of potential pest attacks, and proposes that the idea of awarding sums that amount in total to € 1,89 billion in financial compensation to professional operators, distributors, etc, will be conditional upon those operators showing they have taken sufficient precautionary measures in line with Directive 128/2009/EC on sustainable use of pesticides.

PAN Europe considers that the scope of the Plant Health Directive does not consider the importance of agronomic prevention. Instead, the Plant Health Directive was designed to

focus on the movements of plants and plant products and the eradication or containment of outbreaks.

Alternatives – such as biological control, solid agronomic practices starting with crop rotation may be available but are generally more demanding in terms of knowledge and attention. The development of biological control agents may require substantial investments in research and development over many years, and a demanding and expensive registration process at the end of the pipeline, often preventing new products from being placed on the market at all. Crop rotation is effective to control soil-borne pests, but by definition crops with high profit margins (potato, maize) cannot be grown continuously season after season. It has implications for their direct economic benefits, although long-term costs to the farmer can be reduced.

- If a harmful organism is not yet settled in a given country or region, the strategy could be to prevent them from entering, which could be in many cases mean eradication strategies.
- If a harmful organism is already well-established (like *Diabotrica* in Europe), we should try to manage the pest via agronomic prevention and biological control, rather than attempting eradication. If a harmful organism is settled, it must carefully be investigated whether there is an opportunity that local predators will adapt and integrate the harmful organisms into their menu or whether natural predators of the country of origin can be introduce to enhance the normal balance in nature without contributing to even greater harm to natural balance and biodiversity.

Use of highly toxic substances as methylbromide and hydrogenfluoride can cause great damage, while alternatives like low-oxygen exposure, freezing or drying are also at hand in most cases. Even for fresh products like flowers, alternatives are present and more alternatives should be actively promoted and subsidised.

Chemicals should be used only as a last resort. And in this case, the use of Best Available Technology must be required – e.g. monitoring pests and deceases before spraying, and the use of the best spraying equipment – with GPS- and injection methods to secure that only the single pesticide is used at the required amount for each field.

Calculations made in the impact assessment does not take into account environment and public health impact and costs: The impact assessment accompanying the plant health regime states: *'Even today, ca. 40% of staple cereal crops are lost to pests, diseases and weeds worldwide, equivalent to approximately a billion tonnes. Kenis & Branco (2010; as quoted by Pimentel, 2011) estimate annual economic losses for the EU of approximately €10 billion caused by already introduced alien insects, not including control, eradication, or quarantine costs, nor costs linked to foreign trade or market aspects. This does not yet consider similar costs due to introduced viruses, bacteria, fungi and nematodes, which add up to a multiple of that figure.'*

What the calculations does not include is that using chemicals also come with an economic, human and environmental costs: Studies in the UK and Germany have conservatively estimated annual external costs of pesticide use to be US$ 257 million and $ 166 million, respectively per year, paid by sufferers of pesticide-induced poor health-, as well as by the environment and by citizens[ii]. A recent French study[iii] estimates the overall water pollution costs from nitrogen and pesticides to be 1.5 billion Euros in France per year. A study[iv] estimated the annual economic value of ecosystem services primarily provided by native insects in the United States at $4.5 billion per year. Projections of crop losses that would occur if these insects were not functioning at their current level plus the cost of using insecticides suggest that natural pest control would be a way to save, according to estimation, US$13.6 billion per year in US farming.

PAN Europe proposes: introducing the precautionary principle as one of the core principle in the definitions of the legislative proposals on plant health regime (PHR), and making clear cross references to Directive 128/2009/EC on sustainable use of pesticides and EU Regulation 1107/2009 on authorisation of pesticides.

Ensuring public good nature of the plant health regime: €1.891bn is reserved in the Multiannual framework budget for 2014-2020[v] to among others cover *'direct economic losses for operators, indirect impact on trade, threat to public health, as support eradication and surveillance actions'*[vi]. So while current EU co-financing is limited to costs for eradication and containment in the future it will also co-finance losses of private operators for destroyed plant material following official control measures. In the impact assessment it is clearly stated that: *'The initial absence of co-financing from the regime reflects its supposed private good nature, assuming that measures against harmful organisms would be good agricultural practice and costs from such measures should therefore be considered a risk inherent to entrepreneurship.* And further: *The outbreaks in forests and public and private green in the past decade have highlighted the public good aspects and demonstrated the political need for public (EU) financial compensation.'*

But if the principle is public good aspects, and the way forward is good agricultural practices, should the money then not be from the Common Agricultural Policy?

Farmers already need to apply the so-called green component as part of the Common Agricultural Policy, they already need to apply sustainable agricultural practices as part of Directive 2009/128/EC of 21 October 2009 on sustainable use of pesticides[vii], while both Member States and farmers need to monitor and surveillance in the field as part of Directive 2009/128/EC of 21 October 2009[viii].

PAN Europe proposes: Financial compensations[ix] only giving to farmers able to proof having taken all agronomic preventative actions according to Annex II of the Directive for a sustainable use for pesticides, and used all biological control methods possible, as well as Best Available technology for pesticide reduction - before any paying are authorised to the operator.

PAN Europe proposes: R**evision of Annex II** on 'criteria for the qualification of pests according to their risk to the Union territory' making it in line with the mixed public private funding nature, by 1) ensuring the potential economic, social and environmental loss (and not as written now and/or) to avoid that actions are excluded only at profitability; and 2) reconsider the points mentions as eligible by **keeping** (a) crop losses in terms of yield and quality, (b) costs of control measures; (h) changes to producer costs or input demands including control costs and costs of eradication and containment; **removing** (c) costs of replanting and losses due to the necessary of growing substitute crops; (d) effects on existing production practices; (i) effects on producer profits that result from changes in production costs, yield or price levels; (j) changes to domestic or foreign consumer demand for a product resulting from quality changes; (k) effects on domestic and export market and princes paid, included effects on expert market access and likelihood of phytosanitary restrictions imposed by trading partners.

Plant passports and phytosanitary certificates: The PHR proposes to introduce an official label for movement of plants, plant products and other objects within the EU (article 73), and introduce phytosanitary certificates for plants coming into the Union territory, which according the impact assessment must be based *'on a systems approach consisting of field inspections during the season and inspections on lots prepared for marketing, including mandatory laboratory testing.'* The PHR also proposes that operators within the EU should be free to elaborate their own certificates.

PAN Europe believes that there is a need to increase information not only on pest but also about pesticides. Information that already has to be given according to article 67 of EU regulation 1107/2009 on autorisation of pesticides[x].

PAN Europe proposes as European citizens consider pesticides as the main food risk (Eurobarometer 354/2010 on food related risk), and to make SMART regulation for consumers and citizens that the plant pass board not only inform about potential pest risk, but also about pesticides used, informing both consumers having to eat the products and the community of application.

PAN Europe opposes the idea of allowing operators to issue their own certificates and plant passport, and proposes this part to be deleted from the legislative proposal on PHR.

For further information contact:

Henriette Christensen, henriette@pan-europe.info, +32 2 503 08 37

Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together 32 consumer, public health, and environmental organisations, and women's groups from across 24 European countries. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives.

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[i] http://ec.europa.eu/food/plant/plant_health_biosafety/rules/index_en.htm

[ii] Pretty & Waibel, Paying the price: the full cost of pesticides, *in* J.Pretty, editor. *The pesticide detox*., 39-54 Earthscan, London, UK., 2005

[iii] Cout de principals pollution agricole de l'eau, http://www.developpement-durable.gouv.fr/IMG/pdf/ED52-2.pdf

[iv] Losey, J. E., and M. Vaughan. 2006. The economic value of ecological services provided by insects. BioScience 56: 311–323

[v] Heading food safety underneath heading 3 (security and citizenship).

[vi] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=SWD:2013:0194:FIN:EN:PDF

[vii] Article 14 makes it mandatory for all EU farmers to apply Integrated Pest Management as from 1 January 2014, stating that *'Member states shall take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods, so that 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."*

[viii] *"Member states shall establish or support the establishment of necessary conditions for the implementation of integrated pest management. In particular, they shall ensure that professional users have at their disposal information and tools for pest monitoring and decision making, as well as advisory services on integrated pest management.", with* annex III, point 2 highlighting that *Such adequate tools should include observations in the field as well as scientifically sound warnings, forecasting and early diagnosis systems where feasible as well as the use of advice from professional qualified advisers."*

[ix] Financial compensations can either be giving directly to the operators as part of this regulation, or as part of the Common Agricultural Policy, Rural Development on mutual funds. The criteria of proven to have taken all agronomic preventative measures much apply to both financial instrument.

[x] '*Producers, suppliers, distributors, importers, and exporters of plant protection products shall keep records of the plant protection products they produce, import, export, store or place on the market for at least 5 years. Professional users of plant protection products shall, for at least 3 years, keep records of the plant protection products they use, containing the name of the plant protection product, the time and the dose of application, the area and the crop where the plant protection product was used. They shall make the relevant information contained in these records available to the competent authority on request'*