

PHY(09)5810:1

Brussels, 4 September 2009

COPA-COGECA COMMENTS ON BIPRO STUDY REPORT¹

“Development of guidance for establishing Integrated Pest Management (IPM) principles”

Copa and Cogeca welcome the opportunity to comment on the BiPRO final report, *Development of Guidance for Establishing Integrated Pest Management (IPM)*, and the supplement document, *Draft Guidance Document for Establishing IPM principles*, recently published on the website of the European Commission’s DG Environment.

Copa and Cogeca, however, regret not having being consulted in the same way as other stakeholders. This once again underestimates the added value that European farmers can bring in terms of experience and expertise on integrated pest management practices.

1. General comments on the study

Copa and Cogeca claim that this document adds very little to the ongoing debate. It is totally impractical since it provides only an overview of the existing approaches to IPM principles, without any link to the practical implementation of IPM on the field (number of growers, capabilities of growers, differences by country). It would have been more useful to go in practical terms of IPM implementation by consulting the farming community and ensure a wider implementation of it across the European Union.

EU farmers have a lot of experience in the field of IPM by implementing several existing private schemes. We regret that our knowledge on practical implementation of IPM tools is not recognised.

Copa and Cogeca support the general definition of the FAO codes of conduct and the principles as already widely practised and specified in the *Sustainable Use Framework Directive*. However measures should not be too prescriptive and should only be recommended when they are a viable, practical and cost-effective option. Other factors need to be considered including, for example, market requirements.

¹ “Development of guidance for establishing Integrated Pest Management (IPM) principles” - BiPRO Final Report, dated 24 April 2009.

“Draft Guidance Document for establishing IPM principles – Supplement to the Final Report, dated 23 April 2009

Copa and Cogeca feel that the BiPRO study has been developed well beyond what has been required under the *Sustainable Use Framework Directive*. In fact, considering the nature of this legislative text, it is up to MS to meet the requirements of the Directive. The Commission should not be trying to apply any kind of common standards. In other words, the principle of subsidiarity, included in the *Pesticide Package*, should be fully implemented.

Copa and Cogeca claim that whilst the role of the Government in the MS should be to provide research and relevant information, its role is not to approve rotation or cultivation methods.

There is no reference to take economical thresholds into consideration. For some commodities the economical threshold is the same as the visual threshold: so zero tolerance.

There is no evaluation of the financial impact of these systems for the growers. Administration, certification and a great deal of paperwork will entail excessive costs for the growers.

When it concerns the use of chemical alternatives, it should be stated that MS must provide legal solutions for the growers. A range of chemically active substances with different modes of operations must be available. These solutions must be available on a permanent basis in order to be easily implemented when the problem occurs.

Specific Comments on the IPM principle

Principle 1 - Measures for prevention and/or suppression of harmful organisms

Some of the measures for prevention and/or suppression of harmful organisms such as rotation, variety choice, sowing date and even planting density, are often dictated by the buyer. It is not possible to say that they must grow a resistant variety if there is no market for it.

The idea of the Member State approving a rotation or soil cultivation method is unacceptable. What role does innovation play here? Farmers need efficient tools to produce crops instead of having their activities restricted.

What is the definition of minor crops? It is stated in the text that these minor crops are not very common in some countries. This is an understatement and overlooks the huge problem of crop protection in minor crops.

Principle 2 – Tools for monitoring

Copa and Cogeca acknowledge the crucial role played by the monitoring tools for pests, diseases and weeds. In this regard, early warning systems should be improved and widely implemented in order to minimise the negative impact of diseases, pests or weeds on the final production.

As Copa-Cogeca, we consider growers and farmers to be professionally qualified people.

Relevant authorities or related institutions work “at desktops” to help a grower in case of a problem. When a problem is detected, help must be provided within hours and not days. So institutionalising the help-desk is only a theoretical proposal.

Principle 3 – Threshold values as a basis for decision making

Copa and Cogeca recognise the role played by the threshold values as a basis for decision making, but they must be only considered as a guide and should not be compulsory. Experience on the field, as for example in the UK, has shown that even on a limited number of pests where thresholds exist, a whole host of other factors need to be considered (i.e. value of the crop, how well it is established).

The threshold value in some crops (fruit and vegetables for fresh consumption) is zero tolerance.

Pest classification, on a year to year basis is not common practice. Climatic conditions are the most determining factor in pest and density occurrence. Therefore a decision must be made on the spot and not one year in advance.

A specific example of this is the use of “ temperature sum ” approach. This technique is not mentioned in the document although it is the most effective prediction methodology.

Principle 4 – Non-chemical methods to be preferred

Copa and Cogeca welcome the possibility of using biological, physical and non-chemical methods before a control measure takes place, but often, the farmer has very limited options for controlling the outbreak of a disease. By the time a threshold has been reached, it will be too late to use many of the non-chemical options. Moreover, non-chemical methods often lead to higher economic expenditure for professional users.

Principle 5 – Target-specificity and minimization of side effects

Copa and Cogeca do support the target-specificity and minimization of side effects during prevention measures, but often in practical terms, farmers face already limited degrees of freedom in choosing the protection methods. There are very few situations where a farmer has the option to select between two pesticides in order to control a specific problem with clear differences. How is this achieved in practice, if substance A has a better environmental profile and substance B has a better human health profile? Farmers should be allowed to use any substances which have made it through the very strict registration system.

What is the meaning of such a statement: *as precise as possible*? Do we have to consider this as: *there is not enough information available to help the farmer*?

This is not in line with principle 8 and the policing on the obligation gives zero tolerance to the farmers. This is followed by a very high burden cost in registration and also the possibility of severe penalisation in case some registrations are not fully completed.

In other words, information to the farmers is as precise as possible, and never fully proven. On the other hand, information from the farmer is based on zero tolerance with high penalty.

Principle 6 – Reduction of use to necessary levels

Copa and Cogeca know the duty of reducing, where possible, the level of intervention to that which is considered necessary. In practical terms, the vast bulk of advice given to farmers come from the technicians whose key job is to use the minimum practical intervention. Thus, technicians play a key role of responsibility in advising farmers with the best measure available at the time of intervention.

Dose reductions and risk for development of resistance are strongly linked to each other. This is really a desktop approach. It is not recommended to push farmers to PPP use that is not in line with the authorisation of the active substance.

Principle 7 – Application of anti-resistance strategies

Copa and Cogeca are very aware of the threat of resistance induced by repeated applications. In this regard, the most important method of reducing resistance risk is having available a range of pesticides with different modes of action. The existing *directive 91/414/EEC* and the future *regulation on the placing of PPPs on the market* have and will remove many of these options.

It is not only repeated applications which are inducing resistance, but also a reduced dose is a possibility for the pest to adapt itself to the active substance.

Principle 8 – Records, monitoring, documentation and checking success

European farmers in their practical work already check carefully whether the treatment has been successful or not, and what can be learnt for the future. We do not think that all applications should be recorded. It would impose only an additional burden on the farmer and technicians.

This principle is imposing excessive economical cost to the grower.

This is a desk top approach: growers will be controlled on “standard documentation sheets”. As a consequence, there are high risk for penalties towards growers based on a paper work.

Compliance Monitoring

We have major reservations about this aspect of the proposal. Again, it goes way beyond what is required. The only acceptable solution, which would not greatly increase the burden on farmers, is a requirement for advisors to have training in IPM/ICM activities. In some countries, such as in the UK, there is already a *basis* scheme which now includes IPM measures and the *basis* professional register. In addition, there are also separate courses on IPM/ICM. Asking farmers and growers to document all inspections is totally impractical. Even considering any kind of approval from the Member State on rotation and cultivation methods is totally impractical.

For the first time there is a reference to the need of a “CERTIFICATION SCHEME”; This is way out of economical and practical reality. Certification includes accreditation and huge costs for the participant.

In the market there are already lots of certified schemes. All of them have excessive costs for the growers - none of them is rewarding in terms of a higher price for the product.

In this chapter there are a lot of hidden costs for the grower: certification, advisors, inspection, mandatory administration. This document does not calculate the costs involved.

Comments on the example reported in page 25²: compliance with the GPPP for aphids in winter barley.

The IPM solution relies on planting the crop later. With some weather patterns such as in the UK, this would lead to the crop not being planted in many situations. The priority at this time of year is to get crops established and get all the work completed. To suggest the crop can only be planted on fields which are not adjacent to maize or grass is not practical. By selecting a thick crop, he is then likely to require higher pesticide inputs later in the season for disease control and growth regulator. These aspects cannot be considered in isolation. It says that the grower must remove self-sown (volunteer) cereals prior to sowing – sensible advice but this will be done by spraying off with glyphosate. The monitoring requirements of every 3-4 days would be impractical. At the end of this process, if successfully carried out, the farmer would have the following:

- Existing best practice; well established crop sown at the correct time which was treated with a seed treatment then a selective insecticide;
- IPM approach; volunteer sprayed off with glyphosate; sown late, likely to be a poor crop if weather conditions are unfavourable or if weather conditions are favourable then crop

² Development of guidance for establishing Integrated Pest Management (IPM) principles.

too thick requiring additional fungicide and growth regulator. Insecticide still applied even though a great deal of additional monitoring is required. Saving in pesticide input = 1 seed treatment which is low rate and highly targeted with very low impact on the environment. If the seed treatment had prevented the need for a follow up insecticide effectively a targeted low rate seed treatment would have been swapped for a foliar spray with an insecticide and a much greater impact on the environment .

Chapter 5 : Crop Specific IPM principles

Since IPM includes the possibility of using chemical intervention, MS must provide sufficient access to authorised actives with different modes of actions.

Copa –cogeca proposes at least 3 actives for each mode of action to open possibility of rotation in use of PPP.

Annex 1 - table 2

First line: it states that IPM is looking for superior quality. This is not correct. Every cropping system and every grower is looking for superior quality. In the present market only superior quality is allowed. So claiming that IPM is the only system supporting superior quality is false.