

National Action Plans

on Sustainable Use of Pesticides

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**Part I: Provisions in the Sustainable Use Dir.
2009/128/EC**

Part II: Examples of National Action Plans [NAPs]

France: Ecophyto 2018

Germany: NAP on Sustainable Use of PPP

Part III: Key objectives for biocontrol industry

NAPs (1) [article 4]

Member States [MS] shall adopt **NAPs**

- ➔ to set up their quantitative objectives, targets, measures and timetables to reduce risks and impacts of pesticide use on human health and the environment and
- ➔ to encourage the development and introduction of **IPM** and of **alternative approaches or techniques** in order to reduce dependency on the use of pesticides.

NAPs (2)

- NAPs shall include indicators to monitor the use of PPPs containing active subst. of particular concern, especially if alternatives are available.
- On the basis of such indicators [...] timetables and targets for the reduction of use shall be established, in particular if the reduction of use constitutes an appropriate means to achieve risk reduction.
- Reduction targets preexisting to the directive can be taken into account.
- Provisions for **public participation in preparation and modification of NAPs.**

Provisions in the Sustainable Use Dir. Deadlines for implementation

For NAPs

By 26 Nov. 2012 MSs communicate **NAPs** to COM & other MSs

By 26 Nov. 2014 COM submit to **EP** and **Council** a report on info received from MSs on **NAPs**

In 2017 (latest) MSs shall review **NAPs**

By 26 Nov. 2018 COM report to E.P. and Council on **MS experience in the implementation of national targets [...].** plus, if necessary, appropriate legislative proposals.

For IPM

By 30 June 2013 MSs report to COM on measures for low pesticide-input and of necessary **conditions for implementation of IPM** (info, tools, advice)

By 1st Jan 2014 IPM must be implemented by all professional users

Integrated Pest Management [art. 14]

MS shall

- ➔ **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 envi among those available for the same pest problem. **Low pesticide-input pest management includes IPM as well as organic farming [...]**
- ➔ **favour and support IPM** (tools for pest monitoring and decision making; advisory services)

Indicators [art. 15]

- **Harmonised risk indicators shall be established [at EU level].**
- **In addition MS may continue to use [...] national indicators**

- **MSs shall:**
 - ☞ **calculate harmonised risk indicators [based on PPP statistics]**
 - ☞ **identify trends in the use of certain active subst.**
 - ☞ **identify priority items, e.g. active subst., crops, regions or practices, that require particular attention**
 - ☞ **communicate results of the evaluations to COM, MSs & public**

Indicators (2)

COM shall

- 👉 calculate risk indicators at Community level
(basis: PPP statistics)

- 👉 use these data to assess progress in [...] reducing the impact of pesticides on human health and on the envi.

Training [art.5]

- **MSs shall ensure that all professional users, distributors and advisors have access to appropriate training**

- **By 26 Nov. 2013 MSs shall establish certification systems [...]**

Numerous provisions in favour of

“Non-chemical methods or alternatives”

“Biological pest control”

In Recital, in several articles & annexes,
for reference ► **end of this presentation**



**Definition of non-chemical methods
covers “biological pest control methods”
but those are not specified.**

Global situation

General info in German: <http://nap.jki.bund.de/index.php?menuid=52>

and two examples:

France



and

Germany



NAPs in the E.U.

Overview: Status in Sept. 2010

12



**MSs with already
a draft or
finalised
version**

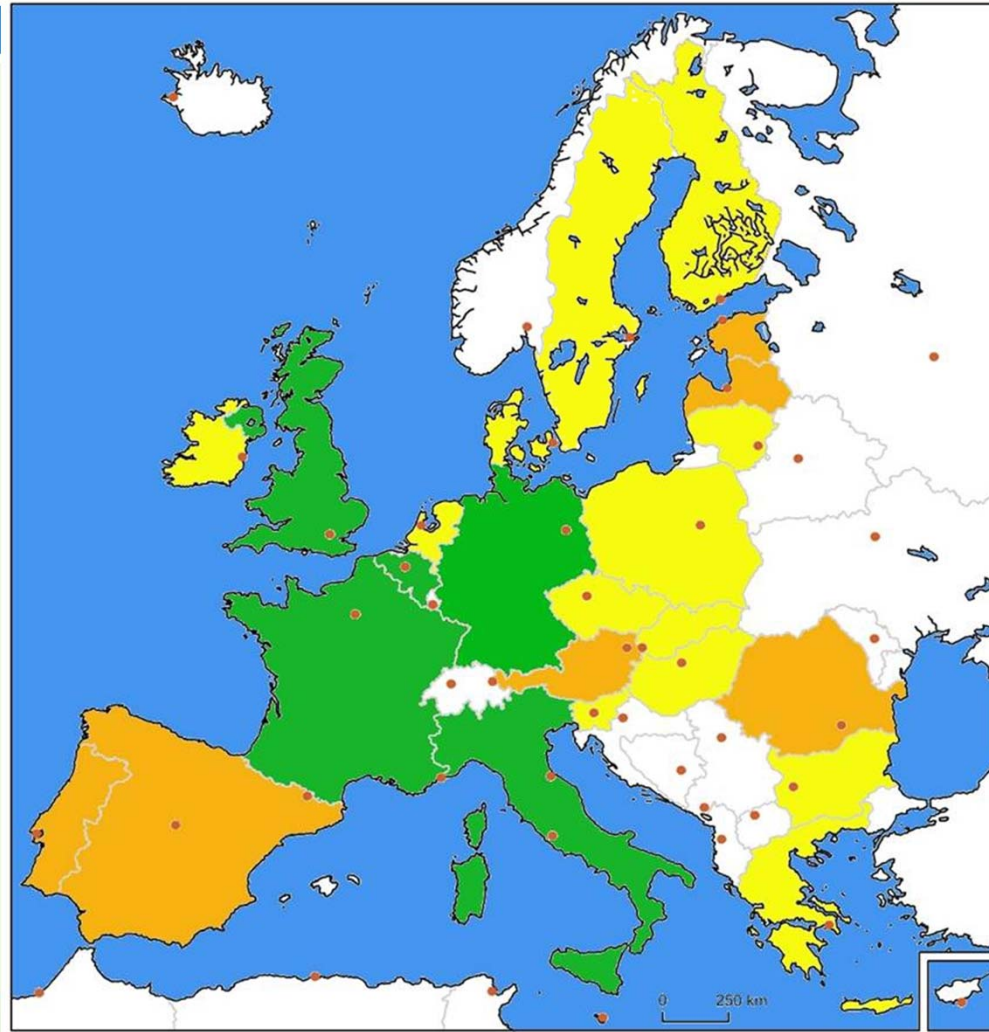


**Release expected
in 2010**



**No indicative
date for a
release**

Courtesy of 



ABIM - Lucerne, 25th October 2010

écophyto2018

Réduire et améliorer l'utilisation des phytos :
moins, c'est mieux

- Launched 2 years ago, formally issued on 10th Sept 2008
- **Main declared objective: reduce the use of pesticides by 50 % within 10 years, if possible.**
(Crop and non-crop PP uses, professional and amateur uses)

 **Quantitative reduction!**

écophyto2018

Réduire et améliorer l'utilisation des phytos :
moins, c'est mieux

8 main axes

- 1 Evaluate **progress in reduction** of pesticide use → **indicators**
- 2 **Means for pestic. reduction** & mobilisation of partners in **R & D**
- 3 **Innovation** in techn. and in low pesticide input systems
- 4 **Training**
- 5 **Monitoring** network
- 6 Specificity overseas depts
- 7 Non-ag areas
- 8 Governance



Indicators

National reference indicator totalising all uses

but based on **sales** of PPP (declaration for pollution tax)

➔ **NODU** = Number of Unit Doses

- Summe of all active subst. divided by their respective **lowest** registered application rates
- NODU also per category
insecticide, acaricides, fungicide, herbicide, others
- **NODU** ⇒ “**NO Distinction of Uses**” since no distinction between crops or between those active subst. used at high and those at low application rates ⇒ overestimation



Indicators (2)

QSA = Quantity of Active Subst. sold over annual period in FR

- Summe of all active subst. whatever their application rate !

IFT = Treatment Frequency Index

- **Based on quantities** of PPP **effectively used** (statistics) at registered rates.
- Calculated per region and per crop



Current work of WG “Indicators”

At present: **neither NODU nor QSA considers hazard or risk**

In perspective: NODU categories based on hazard for humans & envi
Risk and impact indicators to be developed

In discussion: Calculation methods of **indicators for
pheromones, micro-organisms (incl. viruses),
low-risk products**

Critical issues:

- ☹ Proposed **NODU for Invertebrate BCAs**
- ☹ No specific approach to resistance inducers [or to PNPPs]



Indicators – IBMA FR positions & proposals

- Take **specific approach** to resistance inducers
- Create a **positive IFT** for MBCAs, pheromones & low-risk PPP
⇒ “bonus” acting as incentive
- **Abandon** proposal to create a **NODU** for IBCAs



Provisions which can favour Biocontrol

[ex.: axe 2, action 17B]

- *“Facilitate the placing on the market of alternative PPPs, in particular **biocontrol products**”*
- Biological control and integrated biol. protection based on the use of MBCA, IBCA, pheromones, stimulators of natural defenses & vitality could provide solutions of special interest.

6-months mission of a Member of Parliament

- ☞ summarize **situation** of biocontrol in production sectors
- ☞ identify **limiting factors**
- ☞ identify **levers** necessary for development of biocontrol methods
- ☞ propose **action plan**

Nationaler Aktionsplan

NAP on the sustainable use of PPPs

- Set-up before Sustainable Use Dir. finalised
- Formally approved by Ministers of Agriculture (Federal & Länder) on 10th April **2008**
- Focuses on **risk reduction** rather than on specific quantity reduction targets





Goals of the German NAP

- Reduction of the risks associated with the application of PPPs
⇒ by 25 % until 2020
- Reduction of the application intensity of PPP
⇒ necessary minimum amount
- Reduction of domestic and imported food and feed products exceeding MRLs



Indicators - Data Collection

- Representative **network of farms** selected at random (“NEPTUN”)
 - ➔ JKI collects crop and regional specific **statistical data**

- **Network of reference farms** in different production sectors (grain, fruit, wine, horti, etc.)
 - ➔ represent **practices and conditions** in a given region & year
 - ➔ provide annual PPP use data for a given crop for comparison

- On basis of data ⇨ calculation of **reference indicators**



Indicators: Treatment Index

- lists the **number of times a PPP is used** on a given piece of land, crop or farm, **taking account of any reductions in the amounts** used and whether only partial areas of land are treated.
- is averaged for Germany, regions, farms, crops etc..



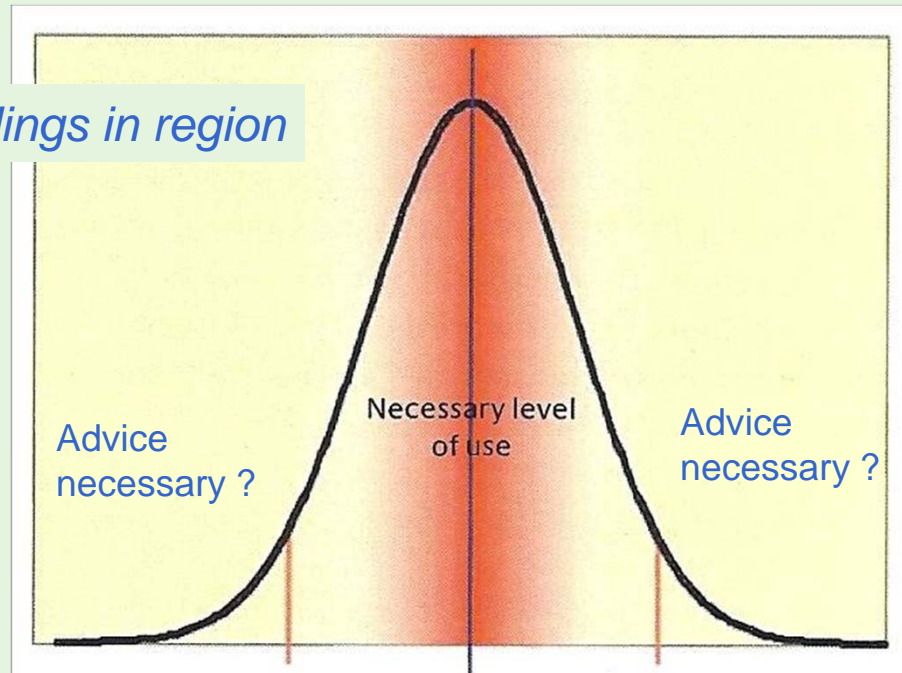
Indicators: Concept of Necessary Minimum

- Year-specific indices for treatments are analysed by experts on the **background of year-specific conditions**
 - The **experts** give an **opinion** what constitutes the necessary minimum (crop, region).
- ⇒ This allows to identify **potential for reduction of PPP use**



Indicators: Concept of Necessary Minimum

Number of holdings in region



Treatment Index

Treatment corridor

Necessary minimum at regional level gives target range



PP Risk Indicators

- Treatment index ⇒ **intensity** of PPP use
- Risk varies depending on PPP, use and practice
- **Reductions in PPP quantity must not result in increased risk!**
- Computer-aided models are used (e.g. SYNOPSIS) or will be introduced to evaluate risks.

Measures which can favour Biocontrol

➔ Research & promotion of innovation towards IPM

- ☺ **BMELV Innovation Promotion Programme** for new methods and optimisation of methods
- ☺ Administration support to R & D (e.g. info exchange)
- ☺ **Development, testing & transfer of non-chemical methods** (e.g. model projects)
- ☺ **Demonstration farms** and field days (e.g. by JKI, regions)
- ☺ **Promotional programmes** to foster IPM and organic farming (⇒ options for funding)



Need to be adapted to Sustainable Use Dir.

- At present four **WGs** with stakeholders in preparation of the next NAP Sustainable Use **Forum**
- **IBMA DE participates** in all WGs and supported by some NGOs proposes to fix a positive quantitative target for BCA use
- **Risk indicators** need to be further developed: “SYNOPSIS” to be improved
- For other areas BMELV waiting for **EU-proposals for harmonized risk indicators**

News about **Plant Strengtheners** ► end of this presentation



Key objectives for IBMA should include

- Get confirmation that **BCAs** are recognized as part of “*alternative approaches and techniques*” and “*non-chemical methods*”
- Obtain **specific approach to BCAs** in NAPs and in authorization processes
- Get access to **supporting programmes** for non-chemical control
- Confirm or obtain **exclusion of BCAs from reduction targets**
- Fix **quantitative targets for introduction / use of BCAs** wherever realistic and possible (e.g. 20% by 2020)
- Obtain **inclusion** of biocontrol methods **in training programmes** for IPM and organic farming



Means to achieve objectives should include

- ☞ **Participate in Steering & other groups wherever possible** → all levels
- ☞ Develop means of communication → website, documents ...
- ☞ **Communicate about potential and use of Biocontrol**
→ regulators, opinion makers, technical organizations, advisors, users
- ☞ Participate in IPM demonstration networks or demonstration farms or platforms
→ e.g. IBMA FR in FARRE network
- ☞ **Refer to positive approaches in existing NAPs or schemes** in other EU MS
→ e.g. BioPesticide Schemes in the UK & in BE
→ provisions in existing German NAP



Means to achieve objectives should include

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IBMA should assist wherever possible

The implementation of the Sustainable Use Directive is a **huge opportunity** for biocontrol industry.

⇒ We must convince all relevant actors (regulators, advisors, users ...) that **BCAs are non-chemical means *par excellence***

fit for IPM and organic farming where they can make major contributions thanks to their efficacy and risk profile.



We must act now!

Merci !

News about Plant Strengtheners

At present: DE PPP definition ⇒ PflStM are not considered as PPPs

⇒ would not covered by reduction targets

But: Coming into force of Reg (EC) No 1107/2010

⇒ **DE Plant Protection Act needs to be adapted**

⇒ **Revision of rules for plant strengtheners**

First legislative proposal is currently discussed at regulator level

If proposal were accepted by legislators

⇒ Plant Strengthenener category would persist

⇒ **Products containing subst. with recognized Plant Protect activity**
in particular **active subst included in annex I would be excluded**

Provisions in dir. 2009/128/EC in favour of BCAs

- [Recital 19]
“[...] implementation of the principles of IPM, with **priority given wherever possible to non-chemical methods** [...] in their NAP”
- [Art. 1 - Subject Matter]
“To achieve a sustainable use of pesticides by [...] **promoting the use of IPM and of alternative approaches or techniques such as non-chemical alternatives to pesticides.**”
- [Art. 3 – Definitions]
“**Non-chemical methods**’ are alternative methods to chemical pesticides for PP and pest management, based on agronomic techniques such as those referred to in point 1 of Annex III, or physical, mechanical **or biological pest control methods.**”

Provisions in dir. 2009/128/EC in favour of BCAs (2)

- [Art. 12 - Reduction of pesticide use or restriction in specific areas]
[...] "**biological pest control methods should be considered first**"
- [Art. 14 - IPM]
"M.S. shall take all necessary measures to promote low pesticide-input pest management, giving **wherever possible priority to non-chemical methods** [...]"
- [Annex I - Training subjects]
include "Notions on [...] **biological pest control methods**; [...]"
- [Annex III - General principles of IPM]
"**Sustainable biological, physical and other non-chemical methods must be preferred to chemical methods if they provide satisfactory pest control.**"

Sustainable Use Directive 2009/128/EC [in EN]

<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:309:0071:0086:EN:PDF>

Ecophyto 2018 [in FR] http://agriculture.gouv.fr/IMG/pdf/PLAN_ECOPHYTO_2018-2.pdf

Ecophyto 2-years [in FR]

<http://agriculture.gouv.fr/IMG/pdf/100927rapport-Ecophyto-1.pdf>

<http://agriculture.gouv.fr/IMG/pdf/100927rapport-Ecophyto-2.pdf>

NAP Germany [in EN]

http://www.bmelv.de/SharedDocs/Downloads/EN/Agriculture/NationalActionPlan2008.pdf?__blob=publicationFile

Info NAPs in different MS (site JKI) <http://nap.jki.bund.de/index.php?menuid=52>

PAN NAP Best Practice

http://www.pan-europe.info/Resources/Reports/NAP_best_practice.pdf