

fying substances such as endocrine disruptors, it might take years and long legal battles to take dangerous substances of the market.

The special sensitivity of children was another battle partly won. The protection of children and vulnerable groups is specified in the criteria for approval of substances, but a methodology to assess safety factors when setting Maximum Residue Limits and Acute Reference Doses is still missing.

Another positive step is the introduction of a simplified registration process for low risk substances (such as biopesticides) which might facilitate market access for less hazardous substances. But the effectiveness of this measure will depend largely on the criteria for the definition of a low risk substance (currently unclear) and the pace of the revision process.

Unfortunately, we also have reasons for concern regarding this Regulation proposal. One of the main factors guiding this revision of the approval scheme for pesticides seems to have been market efficiency - it should have been the protection of human health and the environment. Under this proposal a new zonal authorisation system for products will be implemented. The outlined zones include climatically different areas like Brittany in northern France and Cyprus in the south-eastern Mediterranean. If Cyprus authorises a specific product, France will have to accept its onto the French market too, with little room to alter the approval conditions. Under the current system, countries such as Denmark, Sweden or the Netherlands were successful in removing some hazardous products from their market shelves on the basis of health and environmental considerations. That allowed, for example, the conservation of water resources in Denmark, where water from human consumption can only be extracted from raw sources. If this new Regulation is approved, that situation will no longer be possible and these countries might face the return of products banned more than ten years ago.

Also worrying is the proposal to have a system where after the first revision of substances, the renewal will be for an unlimited period of time, with no provisions for the regular assessment of substances.

The Regulation also fails to consider the impacts of EU decisions upon other countries, especially developing countries. We have to conclude that this proposal lacks leadership at the EU and global level. Hazardous substances will continue to be approved with extensive mitigation measures and will be seen by many developing countries as 'safe' even though small-scale farmers and agricultural workers there have virtually no means of protecting themselves against the hazards of pesticides.

Will the new legislation bring substantial changes?

The new Directive introduces some positive measures for MS that still do not have a



Under the new Directive on the Sustainable Use of Pesticides, aerial spraying will be severely restricted

Photo: Clean Air Action

national action plan addressing pesticides and very little public awareness of the hazards posed by pesticides (Southern European countries and some new MS) but fails to introduce strong measures to curb pesticide use and break the unsustainable link between agricultural productivity and pesticide use. With so few enforceable targets, it will be up to MS to choose whether they implement a cosmetic National Action Plan or a Plan that makes a real difference in the way pesticides are perceived and used by farmers.

As for changes in the approval of pesticides in the EU market, the introduction of hazard based criteria will exclude some of the most hazardous substances but others will continue to be approved with extensive mitigation measures impossible to monitor

and enforce in the field. There are no provisions for fast inclusion of newly recognised effects and it is doubtful whether the new legislation will protect vulnerable groups, in particular children. The substitution principle and a special registration system for low risk substances have been introduced, but the EC itself expressed doubts about their workability. The zonal registration of products will probably mean more products on the market for some countries, namely countries in the Southern zone and countries that have been banning products on the basis of health and environmental considerations, thus invalidating their efforts over the last two decades.

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France's new pesticide plan will not significantly reduce use

France has just adopted a new 'plan for the reduction of risks linked to pesticides' for 2006-2009. The plan recognizes the problem of widespread pollution by pesticides and underlines 'the necessity to take action on products and practices to diminish the use, presence and impacts of pesticides.'

One good measure is the introduction of five metre buffer zones along water courses. Another is the target to halve the use of the so called 'most dangerous pesticides', a list of 47 active ingredients classified as T, (toxic) T+ (very toxic), or CMR (carcinogenic, mutagenic, reprotoxic) categories 1 or 2 (most of which would be substituted anyway under the future EU regulation on the marketing of pesticides). But the plan falls short of measures to reach its goals.

- there are no overall use reduction targets, so France is likely to remain Europe's top user of pesticides for a long time.
- no decent financial support will be given to organic farming. Organic farming in France represents only 2% of cultivated land and this plan does not set any quantitative goals for increasing organic farming.
- no support for IPM is suggested. Instead it offers massive support for 'Agriculture

Raisonnée', the so called 'integrated farming' supported by FARRE, the French branch of EISA, the European Initiative for Sustainable Development in Agriculture. Agriculture Raisonnée does not aim for a reduction in pesticide use. The new plan aims at Agriculture Raisonnée representing 30% of all farms by 2008.

Disquiet over the pesticide issue continues to grow within France, but a policy supporting Agriculture Raisonnée is little more than a presentable face for conventional agriculture.

1. Download the official presentation of the plan from the MDRGF website: www.mdrgf.org/pdf/plan%20interminist%e9riel%20pesticides.pdf
2. 'Proposal for a Regulation of the European Parliament and of the Council concerning the placing of plant protection products on the market'. Proposed text by the European Commission
3. EISA website www.sustainable-agriculture.org
4. Agriculture raisonnée is supported by the FARRE network, which represents the position of pesticide producers. Denis Tardit, chairman of Syngenta France, is Vice President for FARRE, www.farre.org

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