



# **National Action Plan towards the Sustainable Use of Pesticides: Objectives for improved nature conservation as well as protection of the environment and consumers**

**Common position of the Pesticide Action Network Germany (PAN Germany),  
Nature and Biodiversity Conservation Union (NABU) and Greenpeace Germany  
on the implementation of the EU Framework Directive on the sustainable use  
of pesticides and the national action plan**

*English version*

**Hamburg / Berlin, 22 June 2009**



**Protect people and the environment against pesticides. Promote alternatives.**

## Comments on the English translation

The new EU legislation on pesticides obliges all EU member states to establish so-called National Action Plans (in short: NAPs) on the sustainable use of pesticides. The intention behind the National Action Plans on the sustainable use of pesticides is to bring about a reduction in pesticide risks to humans and the environment in the member states in the future. In Germany there already is a National Action Plan<sup>1</sup>, which is the successor programme to the “reduction programme chemical plant protection” adopted in 2004. The current existing National Action Plan<sup>2</sup> is now being revised so as to comply with European requirements.

In Germany a specific Forum (NAP Forum) reviews the progress made with the Action Plan and makes recommendations for its continued enhancement. The Forum managers are answerable to the Plant Protection Section at the Federal Ministry of Food, Agriculture and Consumer Protection. The German Forum is made up of a committee of representatives from the following sectors: consumer protection, environmental protection and nature conservation, agriculture, horticulture and forestry, plant protection product approval and registration, plant protection representatives from the German states (Länder), Länder-specific food safety and animal feed monitoring agencies, the food processing industry, retailers of food and plant protection products and plant protection research. The environmental protection, nature conservation and consumer protection groups which have been active in the Forum for years include PAN Germany, NABU and Greenpeace e.V.

In Germany the Federal Ministry of Food, Agriculture and Consumer Protection (BMELV) is responsible for the implementation of the NAP. In the run-up to an expert workshop held between the 23<sup>rd</sup> and 25<sup>th</sup> of June 2009 and organised by the BMELV, stakeholders from the fields of agriculture, industry, trade, environmental and consumer protection were called on to state their position. PAN Germany, NABU and Greenpeace responded to this call with independent statements as well as a joint statement<sup>3,4,5</sup>. The document at hand is the English translation of this joint response. The demands contained therein are made bearing in mind the specific initial situation in Germany. However, many of these demands are certainly also applicable in the cases of other member states or at least provide a stimulus for further discussion on both a national level within the individual states as well as on a European level.

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<sup>1</sup> The English PAN Germany publication “Towards Pesticide Use Reduction” describes developments up as far as the first reduction programme. It is available at [www.pan-germany.org/download/pesticide\\_use\\_reduction.pdf](http://www.pan-germany.org/download/pesticide_use_reduction.pdf)

<sup>2</sup> English version of the German National Action Plan available as a download at <http://www.bmelv.de/cae/servlet/contentblob/741738/publicationFile/40210/NationalActionPlan2008.pdf;jsessionid=8802B53239C3DD088CB93AF9FCD30F52>

<sup>3</sup> Answers from PAN Germany to the package of questions from the BMELV workshop, held from June 23-25, 2009 in Potsdam, on the implementation of the Framework Directive for the sustainable use of pesticides (National Action Plan). Available online at [www.pan-germany.org](http://www.pan-germany.org) or at <http://etracker.zadi.de/lnkcnt.php?et=qPK&url=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/PestizidAktions-Netzwerk.pdf&lnkname=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/PestizidAktions-Netzwerk.pdf>

<sup>4</sup> Answers from NABU to the package of questions from the BMELV workshop, held from June 23-25, 2009 in Potsdam, on the implementation of the Framework Directive for the sustainable use of pesticides (National Action Plan). Available online at: <http://etracker.zadi.de/lnkcnt.php?et=qPK&url=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/NaturschutzbundDeutschland.pdf&lnkname=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/NaturschutzbundDeutschland.pdf>

<sup>5</sup> Answers from Greenpeace to the package of questions from the BMELV workshop, held from June 23-25, 2009 in Potsdam, on the implementation of the Framework Directive for the sustainable use of pesticides (National Action Plan). May 26, 2009. Available online at: <http://etracker.zadi.de/lnkcnt.php?et=qPK&url=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/Greenpeace.pdf&lnkname=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/Greenpeace.pdf>

## **Demands on the NAP**

The National Action Plan on the sustainable use of pesticides aims to bring about a reduction in pesticide risks to humans and the environment in the member states in the future. To ensure that the National Action Plan contributes effectively to the improved, effective and sustainable protection of humans and the environment from the adverse effects of pesticide use, Pesticide Action Network (PAN Germany), Nature and Biodiversity Conservation Union (NABU) and Greenpeace Germany jointly call for the inclusion of the following objectives into the National Action Plan:

1. Reduction of pesticide use by 30 per cent within the next 5 years calculated according to the standardised treatment index.
2. Defining the “necessary minimum” of chemical plant protection. Formulating maximum treatment indices for individual crops and soil-climate regions.
3. Replacing all pesticides authorised in Germany containing active substances that are classified by the EU as extremely hazardous pesticide substances and those pesticide substances which are on the Greenpeace Blacklist and PAN Germany’s HHP list (HHP = highly hazardous pesticides) with the safest possible alternatives (products and procedures) within the next 10 years.
4. Objectives in plant protection for the effective protection of biodiversity:
  - Waters must maintain or achieve a good ecological and chemical state according to the aquatic quality standards formulated as an objective in the Water Framework Directive.
  - The direct and indirect impact of chemical plant protection on non-target organisms and habitats (e.g. field birds, small mammals, insects, hedges) must be reduced. One biodiversity goal should be the stabilisation of bird populations (farmland birds). Further biodiversity goals have to be developed.
  - Sensitive areas have to be protected against pesticide inputs (keyword buffer zones/stripes) and instruments for the promotion of ecological compensatory measures (ecologically sensitive areas, landscape components) have to be developed.
5. For the protection of the environment, neighbours and pesticide users the following rules should be made binding:
  - Herbicides should not be used on non-cropland or public green areas (to be implemented within the next two years).
  - Ban on the use of all synthetic pesticides by laypersons (to be implemented within the next two years).
6. To protect consumers, the rate of violations of the maximum residue limits (MRLs) has to be reduced for all individual foods from conventional and integrated production to less than 1 percent within the next five years and to less than 0.3 percent within the next ten years<sup>6</sup>.
7. Binding definition of good agricultural practice and Integrated Pest Management (IPM) as well as crop- and sector-specific IPM guidelines. When laying down a binding definition of the IPM standards, the aspects to be considered include the following: Choice of crop, minimum number of crop types in a crop rotation, priority given to preventive and curative

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<sup>6</sup> For the identification of the rates, surveys made by the EU reference laboratory (CVUA Stuttgart) or laboratories with qualification of equal standing (e.g. quality assurance certification) are decisive.

- biological and mechanical plant protection measures, use and documentation of the “threshold of damage” principle, lay out of spraying windows with no pesticide application.
8. Infringements of best practice instructions are effectively combated, and decline by 25% annually. Infringements can include trade and use of illegal pesticides in German agriculture, use of pesticide without required knowledge and infringements of distance regulations.
  9. The introduction of a risk-based pesticide levy, with which the expenses of state supervision and monitoring for pesticide residues and/or pesticide use can be fully covered.<sup>7</sup>
  10. The research and development of non-chemical alternatives to pesticides have to become core elements of the Action Plan. Therefore additional funding has to be made available. Use of these funds for research and development in the area of genetically-modified organisms (GMO) has to be precluded.
  11. Already today there is one agricultural method in particular which is embracing environmental, consumer and agricultural protection, namely organic farming. For the purpose of the Framework Directive instructing member states to promote “non-chemical pest control and low pesticide input” measures, a yearly growth rate of organic farmland by 20% should be aimed for.
  12. The guaranteeing and strengthening of independent pest management advisory structures. Providing the independent pest management advisory structures with sufficient funding. New orientation of the advisory structures for the purpose of the objectives of the EU Framework Directive on the sustainable use of pesticides. Issues such as non-chemical preventive and curative plant protection, crop rotation and choice of crops have to be expanded upon by the advisory service, and included in the training and further training of advisors.
  13. In the course of an improvement to the quality of training and further training of good plant protection practice a time limit should be set for the acquisition of certification in this field of expertise. The obtaining of the certificate recognising this should be bound to the successful passing of a final examination. Apart from providing participants with knowledge relating to the informed use of pesticides, training and further training courses should also provide a professional education in both the theory and practice of non-chemical pest management. These competences should be tested for in the final exam. Binding regulations stating that infringements of the guidelines will result in the loss of this certificate of expertise have to be established.

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<sup>7</sup> In 2007 the net domestic sales of pesticides in Germany amounted to 1.233 billion euro. (IVA Jahresbericht 2007/2008 - annual report from the Agriculture Industry Association (IVA) )

## Background

The new EU legislation on pesticides obliges all EU member states to set up so-called National Action Plans (in short: NAPs) on the sustainable use of pesticides. In Germany there already is a National Action Plan, which is the successor programme of the “reduction programme chemical plant protection” adopted in 2004. This now has to be adapted to the requirements of the EU Framework Directive<sup>8</sup> and revised accordingly. The agency responsible for this in Germany, the Federal Ministry of Food, Agriculture and Consumer Protection (BMELV), held a workshop in Potsdam on the “implementation of the EU Framework Directive on an Action Plan for the sustainable use of pesticides”. It took place from the 23<sup>rd</sup> to the 25<sup>th</sup> of June 2009, and those present included stakeholders from the fields of agriculture, industry, trade, environmental and consumer protection. In the run-up to this workshop stakeholders were called on to present their position. The statements of the three nature conservation and environmental protection associations PAN Germany, NABU and Greenpeace presented in the Forum were sent to the BMELV at the end of May/beginning of June 2009 and are available online<sup>9, 10, 11</sup>.

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<sup>8</sup> Framework Directive on the sustainable use of pesticides, available online at <http://ec.europa.eu/environment/ppps/home.htm>

<sup>9</sup> Answers from PAN Germany to the package of questions from the BMELV workshop, held from June 23-25, 2009 in Potsdam, on the implementation of the Framework Directive for the sustainable use of pesticides (National Action Plan). Available online at [www.pan-germany.org](http://www.pan-germany.org) or at <http://etracker.zadi.de/lnkcnt.php?et=qPK&url=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/PestizidAktions-Netzwerk.pdf&lnkname=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/PestizidAktions-Netzwerk.pdf>

<sup>10</sup> Answers from NABU to the package of questions from the BMELV workshop, held from June 23-25, 2009 in Potsdam, on the implementation of the Framework Directive for the sustainable use of pesticides (National Action Plan). Available online at: <http://etracker.zadi.de/lnkcnt.php?et=qPK&url=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/NaturschutzbundDeutschland.pdf&lnkname=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/NaturschutzbundDeutschland.pdf>

<sup>11</sup> Answers from Greenpeace to the package of questions from the BMELV workshop, held from June 23-25, 2009 in Potsdam, on the implementation of the Framework Directive for the sustainable use of pesticides (National Action Plan). May 26, 2009. Available online at: <http://etracker.zadi.de/lnkcnt.php?et=qPK&url=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/Greenpeace.pdf&lnkname=http://www.fachworkshop-rahmenrichtlinie.de/fileadmin/sites/default/files/Greenpeace.pdf>