

EISA View and Recommendation

Framework Directive on Sustainable Use of Pesticides (Klass Report)

Upcoming Vote in the EP Environment and Health
Committee on 5th November



With a view to the upcoming vote in the EP Environment and Health Committee on the amendments to the Sustainable Use of Pesticides Framework Directive, **EISA would like to express their sincere concerns** with regard to the risk this poses to the further sustainable development in agriculture. **EISA urge the committee to support Integrated Farming (IF) in general as a holistic concept and guideline for the practical implementation of the Sustainable Use Directive measures on farm and recognise Integrated Pest Management (IPM) as a key component of this overarching framework.** This holistic concept is based on the understanding that all farming activities must be shaped according to the individual site and situation of a farm. In contrast to this IF concept, **defining in all detail IPM elements and crop specific IPM standards at European level is counterproductive.** We believe that it endangers the flexibility needed on farms to produce sufficient high-quality food at affordable prices whilst taking care of the environment at the same time.

EISA and their national members therefore strongly recommend rejecting any amendment that fixes elements of IPM at European level which thus are not adapted to the reality of farming on the ground. In particular we reject amendments which fix EU-wide “crop specific standards”. With regard to the growing need for food, feedstuff, fibre and energy on a worldwide scale, agricultural productivity and efficiency must be enhanced rather than cut down, and farmers need to be allowed to use all available tools in a responsible manner, i.e. to follow the holistic concept of Integrated Farming, to respond to this challenge. This is not only important for the economic status of the European Union, but also we have a moral duty to European citizens – providing affordable food, of high quality and grown with consideration to the environment. This approach can be achieved through IF and the integration of IPM within this framework – but not through adopting a potentially restrictive crop specific approach which the Sustainable Use Directive threatens to be.

EISA and their national members in particular recommend rejecting the following amendments:

- **Amendments:** 24, 25, 26, 84, 85, **86, 88**, 91 and **108** (on IPM, levy on pesticides, general and crop specific standards, IPM based on one sided non-chemical methods).
- **Amendments:** 41, **43, 44, 45, 46, 106** and **107** (on use reduction targets), in particular amendments 39 and 40 (definition of use reduction as “reduction of pesticide application”) and equally **Compromise Amendment: 2**

EISA and their national members recommend following the holistic approach of Integrated Farming (see: EISA Integrated Farming Framework under www.sustainable-agriculture.org) rather than pursue approaches such as the introduction of mere **reduction targets or general and crop specific European standards on IPM which have to be seen as counterproductive for the future sustainable development of European agriculture.** Further explanations for the EISA position on the elements mentioned in amendment 108 are offered in the attached background paper of the Institute for Agriculture and Environment (ilu) in Bonn, Germany.

31.10.2008

