



Risk mitigation measures in PPP evaluations and decision making

Sustainable Solutions to Protect Crops, 2021

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Unit E4 – Pesticides and Biocides

DG Health and Food Safety

Outline

- Why work on Risk Mitigation Measures?
- Workshop January 2020
- Next steps – ongoing works

Why work on Risk Mitigation Measures?

- **Farm to Fork Strategy** calling for 50% reduction of risks (and use) of chemical pesticides
- Difficulties encountered to fulfil protection goals and conclude positively the risk assessment if RMM are not proposed/assessed/agreed/informed/implemented, e.g. **integrated in the risk assessment process**

Reduce by 50%
the overall use
and risk of
chemical
pesticides and
reduce use by
50% of more
hazardous
pesticides

Reduce nutrient
losses by at least
50% while ensuring
no deterioration in
soil fertility; this will
reduce use of
fertilisers by at
least 20 %

Reduce sales of
antimicrobials
for farmed
animals and in
aquaculture by
50%

Achieve at least 25%
of the EU's agricultural
land under **organic
farming** and a
significant increase in
organic aquaculture

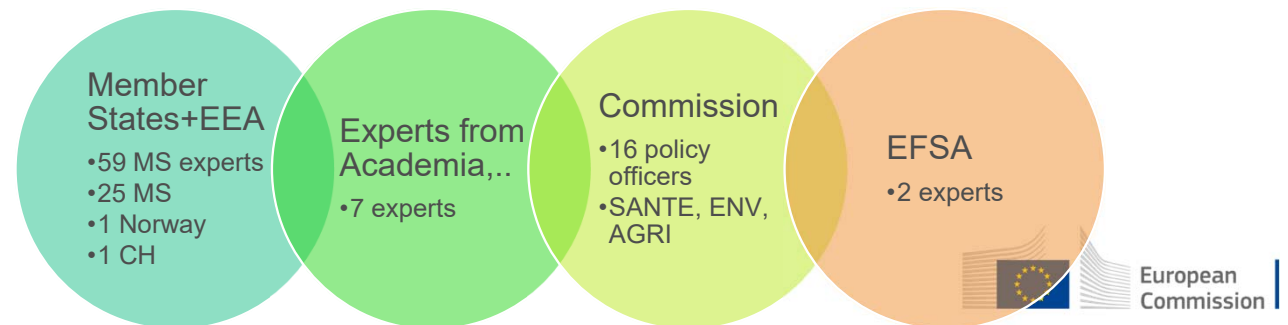


Workshop January, 17, 2020

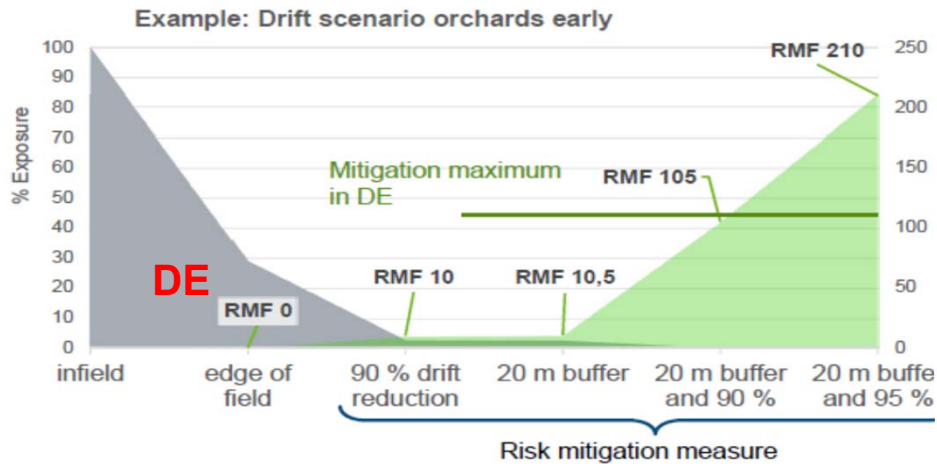
1. MS, EFSA Experiences with RMM

2. Identify challenges faced by MS

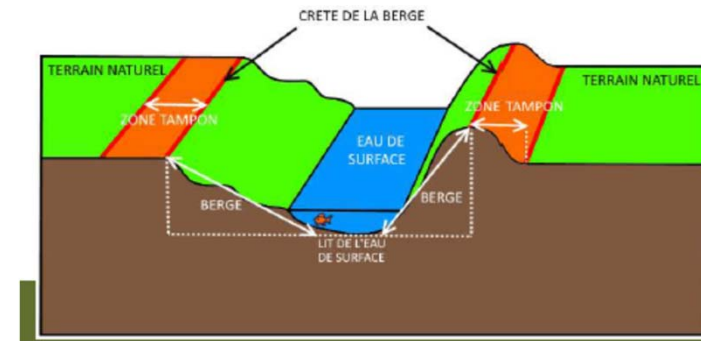
3. Illustrate possible solutions and discuss way forward



W1. Experiences from MS/EFSA



EFSA



BE

IT

RUNOFF PAGE

Insert the Farm name

Link to the Home Page

el ruscellamento

Page Home

Mitigation Measures (m.m.)

Specific m.m. options.

Reduction percentage of the single specific m.m.

Visualization of the m.m. adopted

Total Resulting mitigation %

Possibility to save or print the generated report with the date*

Page Home

* Ottimizzato per Google Chrome e per Mozilla Firefox / Optimized for Google Chrome and Mozilla Firefox



NL

Droftreducerende spuitdop	DRD-klasse bij maximale spuitdruk (bar)			
	50%	75%	90%	95%
Agrotop AirMix 80-025 Hollow Cone (HC)	3*	3		
Agrotop AirMix 110-02	4.5			
Agrotop AirMix 110-025	5			
Agrotop AirMix 110-03	4.5	2		
Agrotop AirMix 110-04	6	4		
Agrotop AirMix 110-05	7	4	2	
Agrotop TurboDrop HiSpeed 110-02	5	3		
Agrotop TurboDrop HiSpeed 110-025	6	3	2.5	
Agrotop TurboDrop HiSpeed 110-03*	4	2.5		
Agrotop TurboDrop HiSpeed 110-04	6	3	2	
Agrotop TurboDrop HiSpeed 110-05*	8	3		
Agrotop TurboDrop TD 110-02	9			
Agrotop TurboDrop TD 110-025	4			
Agrotop TurboDrop TD 110-03	9			
Agrotop TurboDrop TD 110-04	3			
Agrotop TurboDrop TD 110-05	3			
Agrotop TurboDrop TD 110-025	8			
Agrotop TurboDrop TD 110-03	7			
Agrotop TurboDrop TD 110-04	10	3	3	
Agrotop TurboDrop TD 110-05	10	7	3	2

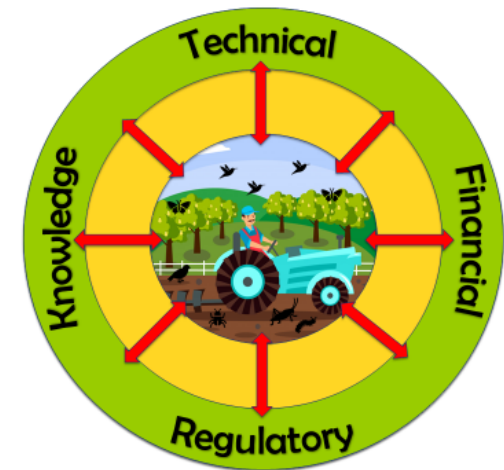
W1. Practices identified by MS

Buffer zones Surface water	22
Drift Reduction Nozzles	15
Vegetated Buffer Strips	12
Frequency of use restriction	11
Application rate restriction	10
PPE	9
Water Abstraction Zone Ban	8
Spe Phrases	5
Sprayers cleaning/filling	4
Bystanders distance zone	4
Training of users	2
Re-entry period	2
Wind Speed	1



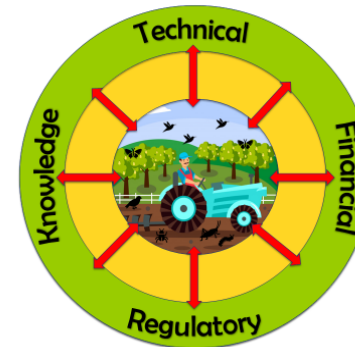
W2. Challenges identified by MS

- Lack of knowledge/awareness of key actors
- Economic/financial factors
- Technical/methodological “barriers”
- Regulatory factors

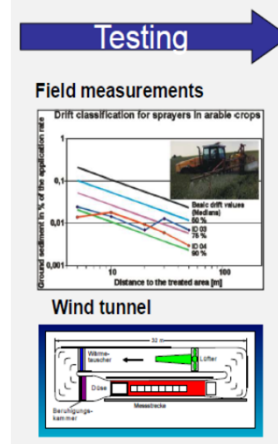


W3.Possible solutions

Technologies

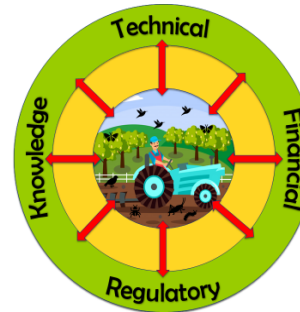


Reduced spray volume/dose (%)	
standard	E
0-10	D
10-20	C
20-30	B
30-40	A
40-50	A+
50-60	A++

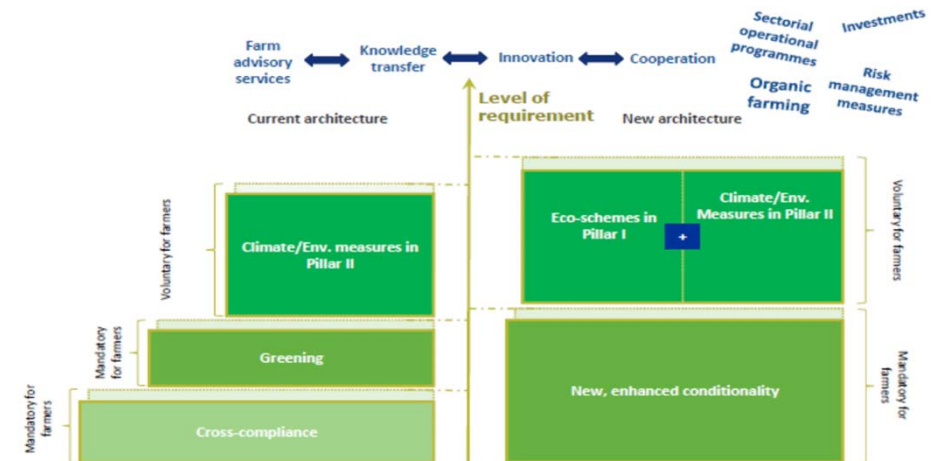


W3. Possible solutions

Users



CAP



W3. Possible actions identified by participants

- Harmonised classification of RMM performance
- Update of Risk Assessment Guidance Documents
- Training of actors
- Support to farmers through the CAP instruments

Next steps initiated by DG SANTE (1)

- Extending list of Spe/Spo (Regulation 547/2011): example

Current SPe 1 says:

To protect groundwater/soil organisms do not apply this or any other product containing (identify active substance or class of substances, as appropriate) more than (time period or frequency to be specified).

The phrase shall be assigned : “...when, risk-mitigation measures are necessary to avoid accumulation in soil, effects on earthworms....”

But other MSs specify in their national lists:

- MS A : Dangerous to worms and other soil micro-organisms (in case products are destined to non-professionals)
- MS B: The product is classified as damaging for populations of earthworms; therefore, this product and products containing this/these active substance(s) should only be used once every 2 years or 3 years or except for nursery beds etc.....
- MS C : The product is toxic/harmful for earthworms ...or risk to earthworms and other soil macro-organisms is considered to be acceptable or product not assessed for earthworms

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New SPe 1 b proposal could read:

Toxic/harmful to earthworms/in order to **protect** groundwater/earthworms, do not apply this product **in** **amateurs' gardens**, more than once every **3** years/every **2** years or **only on nursery beds** or **only on band-rows** allowing recovery

And many MS sentences to be reviewed accordingly...

Next steps initiated by DG SANTE (2)

- Listing of existing risk mitigation measures

Aim: *An EU “living” list of standard RMMs to be considered during the assessment of active substances and made available for MS authorization process of PPPs*

Format: *an excel database with (1) definition/description, (2) applicable use scenarios, (3) benefitting non-target organisms or compartments, (4) known performance ranges (e.g. risk mitigation factors when available)*

+ *website to illustrate and provide links to MS lists, scientific articles, research projects, relevant EFSA guidance documents, examples in MS authorisations...*

Next steps initiated by DG SANTE (3)

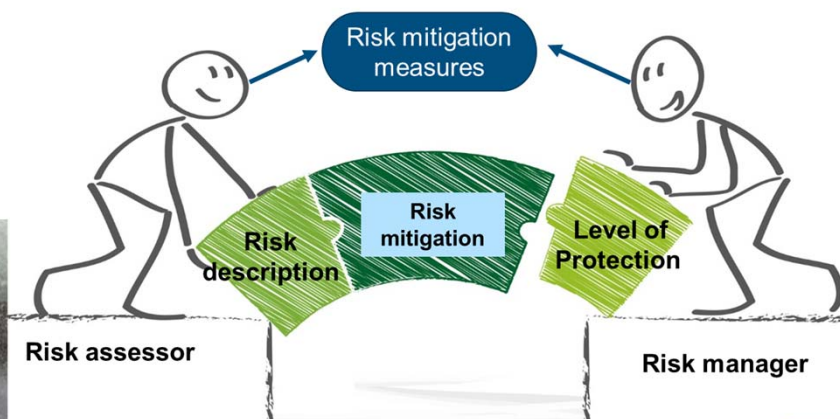
- Drafting a Guidance document:

- Legal basis related to RMM, links with SUD, IPM, non specific precaution, national provisions, machinery regulations
- Specific vs. Generic RMM and influence on status of approval (restriction or not?, low-risk substances/products?, professional users vs. amateurs?)
- Technical specification for each RMM: definition, reported performance (ranges) with additional explanations, references to EFSA GD
- « Limits » of applicability for each RMM and their combination linked to EFSA GD and their realistic implementation by risk assessors, risks managers, ...and users (!)

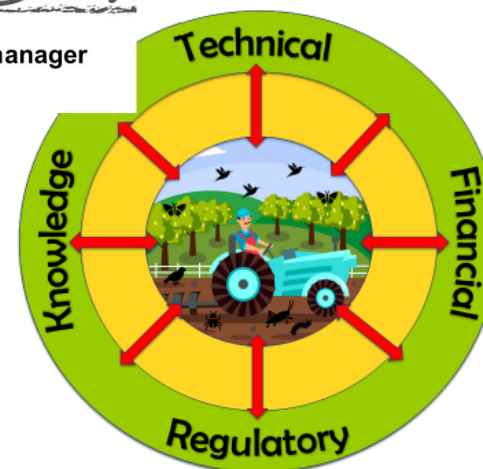
Other (ongoing or planned) initiatives

- Revision of SUD (Sante F.3)
- Better Training for Safer Food (Sante F.6): e-learning module
- Survey on adoption of use/risk reduction technologies (JRC D.4)
- AGRI/RTD/REA calls for Research projects to reduce pesticide dependency
- CAP instruments (AGRI)
- Zero-pollution strategy + Biodiversity strategy (ENV)
- ...CropLife Europe initiative on Closed Transfer Systems

Hopefully what Risk Mitigation Measures can bring to PPP policies...



Streloke et al, ECPA Conf.2019



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https://ec.europa.eu/food/plant/pesticides_en
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Thank you



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