



Bundesamt für  
Verbraucherschutz und  
Lebensmittelsicherheit



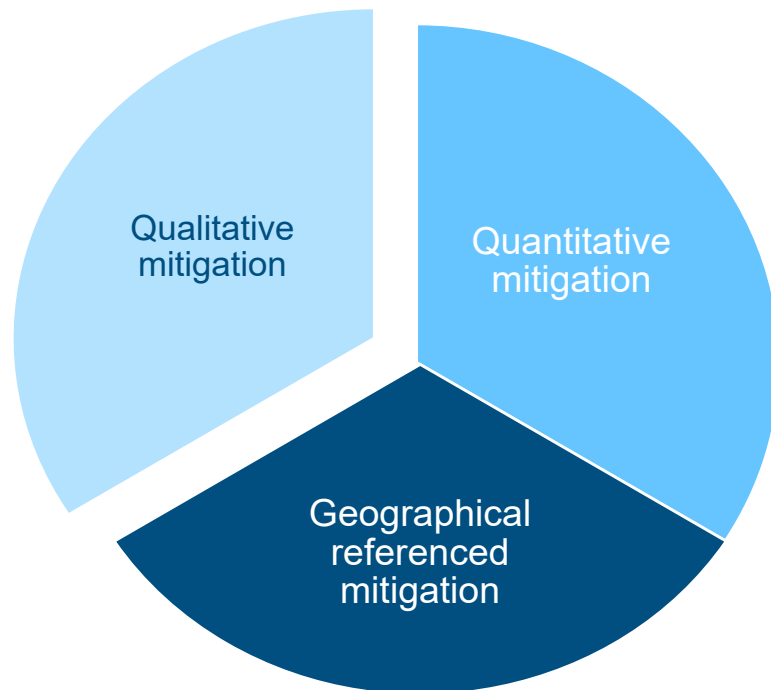
# **Implementation of RMM in Germany: Experiences and challenges**

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- Risk Mitigation Measures (RMM) in Germany
- Classification of RMM
- General conditions
- Challenges and suggestion for way forward

- Around 250 different RMM are in place in Germany
- General principles (...all the glisters is not science)
  - Practicability
  - Controllability
  - Data based
  - Justiciable
- Technical RMM preferred

## Classification of risk mitigation types



### **Qualitative mitigation:**

Degree of mitigation can only be estimated

### **Quantitative mitigation:**

Degree of mitigation can be quantified

### **Geographical referenced mitigation:**

Mitigation taking into account local conditions

## Example 1: Qualitative risk mitigation

### Groundwater protection

#### S<sub>Pe</sub> -2

To protect groundwater do not apply to (*soil type or situation to be specified*) soils.

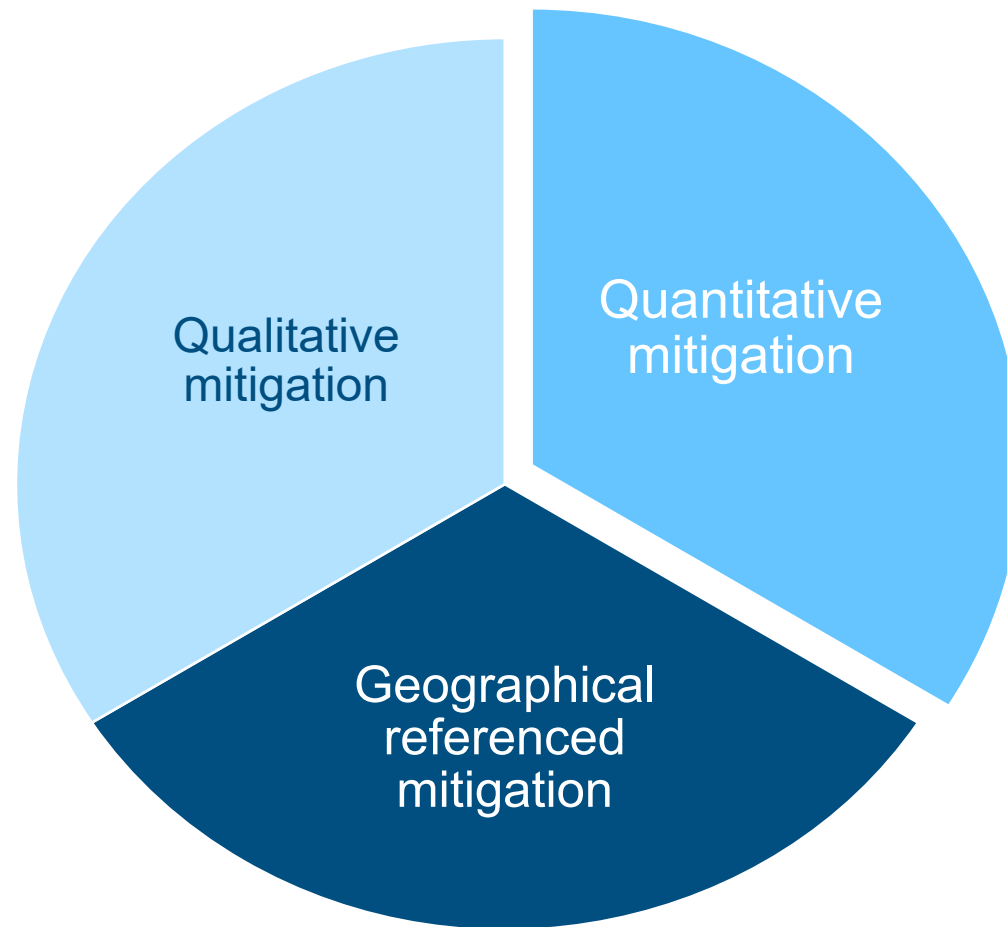
#### German NG 407

Not to be used on the following soils: pure sand, slightly silty sand and slightly clayey sand.



Harmonisation is possible with little effort,  
more and reworded S<sub>Pe</sub>-phrases needed

## Classification of risk mitigation types



# Quantitative risk mitigation

## RMF which can be reached by certain RMM (example arable field crops)

Buffer (m) (% drift)	Resulting RMF (e.g. Drift 1 m/ Drift 5m)	drift reduction technique ( 90 %) Resulting RMF	Combined RMF
1 m (2,77 %)	1	10	10
5 m (0,57 %)	$2,77/0,57=4,9$	10	49
10 m (0,29 %)	$2,77/0,29=9,6$	10	96
20 m (0,15 %)	$2,77/0,15=18.5$	10	185



**Each MS can derive adequate RMM to meet the necessary RMF  
(for example only with buffer zones or with a combination of RMM)**

## Classification of risk mitigation types





# Example for regional/local risk mitigation

## Groundwater protection

- Use of specific a.s. ban in specific drinking water abstraction areas
- Certain criteria must be fulfilled

- **NG 301**

Not to be used in water protection areas or catchment areas of drinking water supply works which are published in the Bundesanzeiger (Federal Gazette) (Notification 15/02/01 of 12 February 2015, BAnz AT 27.02.2015 B6, as amended; also published on [www.bvl.bund.de/NG301](http://www.bvl.bund.de/NG301)).



- **Member States are responsible for RMM (subsidiary principle)**
- **Measures are already in place in each MS**
  - Changes are complex and labour intensive
- **Huge and diverse amount of RMM is implemented in MS**
- **Farmers need to understand RMM**
  - Communication is essential
  - RMM must be concise
  - System of RMM must be itself consistent
  - Otherwise no acceptance by farmers
- **System should be open for innovation**
  - E.g. precision farming
  - E.g. application by drones

- Harmonisation of RMM in context of ZV3/ZVU authorisations
  - Example: different width of buffer zones to surface water
  - Accepted maximum in Germany 20m
  - Example drift reduction
  - Accepted maximum drift reduction in German 90%
- Differences in acceptance of different RMM
- Combination of RMM
  - Different approaches can be combined
  - Example drift-reducing techniques and buffer zones
- Common understanding and common data basis to assess the potential for risk mitigation for measures

- Room practical/pragmatic solution e.g. combination of RMM
  - RMM potential might be not fully estimated
  - But expert judgement must be available
  - But potential must be monitored
- Ideal approach:
  - Step1: risk assessment determine a needed risk mitigation factor
  - Step 2: risk management choose RMM with defined risk mitigation potential (e.g. EU wide agreed catalogue)
- Agreement on maximum risk mitigation measure

- Framework conditions
  - Keep in mind: MS are responsible for RMM
  - RMM must be flexible enough to address the demands of the specific conditions and agricultural practices in each MS
  - Harmonisation of the data basis must be improved
  
- What we have (starting points)
  - List of current risk mitigation measures in MS
  - MAgPie report
  - High interest of MS, EU COM and EFSA
  - First discussion on EU workshop, process already started

## Suggestion for next steps

### Implementation of RMM in the authorisation of a.s.

- General option in the authorisation process
- Open question: How to implement RMM demonstrating safe use in active substance evaluation process
- In the draft reports MS suggested RMM to demonstrate safe use in the a.s. approval process
- MS should give a scientific sound rationale to demonstrate the risk mitigation factor of the suggested measure
- MS should comment on and discuss the suitability of suggested the RMM in the peer review and in expert meetings
- An agreement on the efficacy of the RMM by the MS should be striven

## Suggestion for next steps

### Implementation of RMM in the authorisation of a.s.

- Noted RMM which were already used in the approval process can be used in future application without a detailed rationale on their efficacy.
- Over time a catalogue of sufficient RMM including their risk mitigation factor might be generated and easily used.
- In parallel EU COM is collecting and collating the risk mitigation measures establish in the MS. These list can be used as “source of inspiration” to select sufficient risk mitigation measures.
- Last but not least harmonisation of RMM in the authorization PPP is also needed to avoid problems by the mutual recognition process

# Thank you for your attention!

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