Why change the existing input evaluation system, and how?

Introduction

- Bernhard Speiser
ORGANIC INPUTS EVALUATION project

- Concerted Action
- Duration: January 2003 – December 2005
- 12 partners and many external experts

Objectives

- «Policy support» for improvement of organic farming legislation.
- To develop harmonized and standardised procedures for evaluation of plant protection products, fertilizers and soil conditioners for use in organic agriculture.
A few terms explained ...

- **PPP**  Plant protection product(s)

- **F&SC** Fertilizer(s) and soil conditioner(s) *
  * also called «soil improvers»

- **inputs** = PPP + F&SC

- **OF** Organic farming

- **product** «item» listed on Annex II of Reg. 2092/91; do not confound with «commercial product»
Relevant aspects of Regulation 2092/91

Article 1-16

Art. 6
only products from Annex II may be used

Annex I-VIII

Art. 7
Rules for changing Annex II

Annex II A
Allowed fertilizers and soil conditioners

Annex II B
Allowed plant protection products

Annex II F
«Other products» (empty)
Overlap with other legislation

**Organic farming**
Reg. 2092/91

What can be used

**Conventional farming**

**PPP**
91/414 & nat.

**F&SC**
Inventory of the existing system

- «Current Evaluation Procedures for Plant Protection Products Used in Organic Agriculture»
- «Current Evaluation Procedures for Fertilizers and Soil Conditioners Used in Organic Agriculture»
- Download: www.organicinputs.org
Main findings of inventory

- **Large variability** between EU Member States concerning what is allowed and what is not allowed for use. Main reasons for this are found in the general legislation (outside organic agriculture), e.g. pesticide registration, fertilizer admission, rules for input traders.

- **Simplified registration procedures** may help to overcome problems with registration at national level, but are themselves highly variable.

- Inclusion of new products is very slow, or in most cases impossible.

For examples see presentation by Marc Trapman
Example of variability: copper fungicides

8 kg/ha allowed (Reg. 2092/91)

1.5 - 4 kg/ha allowed (PPP registration, crop specific, and/or private standards)

not allowed (registration withdrawn)
Examples of simplified procedures

Most countries have **no** simplified procedures.

- **NL**: «RUB» — low-risk
- **IT**: Presidential Decree 290* — traditional OF products
- **PT**: Decree no 1232/2001* — only for OF; no fees
- **DE**: «plant strengtheners» — mode of action
- **DE**: «farm-made products» — traditional products
- **CH**: partial efficacy

*aimed at organic farming
Main needs for improvement (1)

More comprehensive evaluation criteria. Harmonization with Codex Alimentarius and other standards.

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Present Art. 7</th>
<th>proposed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-contact (for PPP)</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Traditional use</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>Necessity</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Environment</td>
<td>yes</td>
<td>yes</td>
</tr>
<tr>
<td>Origin</td>
<td>no</td>
<td>yes</td>
</tr>
<tr>
<td>Manufacture</td>
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<td>yes</td>
</tr>
<tr>
<td>Human health</td>
<td>no</td>
<td>yes</td>
</tr>
<tr>
<td>Socio-economic impact</td>
<td>no</td>
<td>yes</td>
</tr>
<tr>
<td>Organic farming principles</td>
<td>no</td>
<td>yes</td>
</tr>
</tbody>
</table>

See presentation by Cristina Micheloni
Main needs for improvement (2)

Procedures which allow efficient and transparent handling of requests.

- **present**
  - Request
  - Discussions
  - Decision

- **proposed**
  - Request
  - Review
  - Evaluation
  - Final recommendation

See presentation by Francis Blake

See presentation by EU expert panel
Main needs for improvement (3)

A criteria matrix for technical support (puts the criteria into practice).

Article 7

Applicant: How to prepare a request?
Evaluator: How to evaluate a request?

See presentation by Christopher Stopes
The product is allowed!

Role of the criteria matrix

- The criteria matrix provides support for those who evaluate inputs,

- but the matrix does not decide itself whether an input is allowed or not.

Bad example:

\[ \sqrt{LD_{50}} \times E = mc^2 \]

The product is allowed!
Use of the criteria matrix

To illustrate the use of the matrix, two case studies were carried out:

- Hydrolyzed animal proteins (N fertilizer)
- Spinosad (insecticide)

See presentations by Chris Koopmans and Bernhard Kromp
## Summary of our proposal

<table>
<thead>
<tr>
<th>Possible implementation</th>
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<tbody>
<tr>
<td>Better evaluation criteria</td>
</tr>
<tr>
<td>Better procedures, advice by expert panel</td>
</tr>
<tr>
<td>Criteria matrix for technical support</td>
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</tbody>
</table>

* «Establishing an independent expert panel for technical advice.»
Acknowledgements

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- Project partners and external experts

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