



THE PRECAUTIONARY APPROACH IN CROP PROTECTION

The precautionary approach is an important concept in the regulation, marketing and use of chemical products, as is exemplified by the 'precautionary statements' on the product labels. The precautionary approach is sometimes referred to as the 'precautionary principle'. However, the two terms should not be confused. CropLife makes a clear distinction between the precautionary approach and the 'precautionary principle'. CropLife does not support this 'precautionary principle', a term that is sometimes invoked to delay, inhibit or stop altogether the introduction of useful and beneficial products and technologies, even though such introduction is supported by scientific studies and has been reviewed and approved by the relevant regulatory authorities.

What is the precautionary approach?

There is no single agreed definition of what constitutes the precautionary approach, but it can be described as a preventive measure put in place when:

- there is a threat of serious or irreversible damage to human health or the environment and
- the relevant science is not sufficiently certain to determine how a potential threat can be avoided or mitigated effectively.

The precautionary approach is incorporated in key international agreements, primarily in the United Nations Conference on Environment and Development (UNCED) Rio Declaration, Principle 15 and Principle 12 of Agenda 21, as well as the World Trade Organisation (WTO) Agreement on Sanitary and Phytosanitary Measures (SPS Agreement). These documents offer a basis for defining the precautionary approach and its application (see text box).

The precautionary approach is inherent in regulatory decision making that is based on best available scientific method and information and is practiced by most regulatory bodies in the world. Whilst the precautionary approach is primarily oriented towards risk, regulatory decision making also takes benefits into account.

THE PRECAUTIONARY APPROACH SHOULD BE PROVISIONAL, PROPORTIONAL AND NON-DISCRIMINATORY

- APPLIED TEMPORARILY, WITH A TIME LIMIT FOR ITS REVIEW AND REVISION
- PROVIDE FOR ON-GOING SCIENTIFIC EVALUATION OF THE EFFECTIVENESS OF THE RESTRICTION
- AN APPROPRIATE MEASURE TO BE TAKEN IN THE ABSENCE OF FULL SCIENTIFIC CERTAINTY
- PROPORTIONATE TO THE OBJECTIVE TO BE ACHIEVED AND TO THE RISK TO BE AVOIDED
- USED ONLY IN THE CONTEXT OF A SERIOUS THREAT TO HUMAN HEALTH OR THE ENVIRONMENT
- NOT USED TO PROTECT SPECIFIC PRODUCTS OR TO DISCRIMINATE AGAINST OR AMONG PRODUCTS

How should the precautionary approach be used?

CropLife International believes that a rigorous science-based approval system constitutes the best regulatory approach for crop protection products and that this approval system is intrinsically precautionary. All crop protection products undergo extensive tests for efficacy, safety and quality before they can be granted approvals by regulatory authorities. Science-based risk assessment determines whether a product may warrant the implementation of precautionary measures as part of the risk management procedures.

Estimating costs and benefits of implementing precautionary measures requires a thorough assessment of all the uses of a given product. For example, precautionary measures to prohibit the slightest possibility of endocrine disruption could mean banning essential products, such as triazole fungicides. However, triazoles are vital to avoid residues of mycotoxins in food and fed products, which would threaten human and animal health. Hence to assess the appropriateness of restricting the use of triazoles, it is important to weigh the impact of the restriction or ban on the positive health impacts of triazole use. In effect, other measures to limit risks may be more appropriate and more efficient than the application of precautionary measures.

The precautionary approach should only be applied as part of a complete risk assessment and risk management strategy. As the precautionary approach is already built into registration systems, the implementation of any further restrictive actions should be carefully assessed and monitored in order to avoid unintended consequences. Precautionary measures need to be necessary and must be proportionate to the threat. They must not be used to discriminate against products, restrict trade unfairly, impede research, or stifle innovation.

To ensure that precautionary measures are only used when needed and only for as long as needed:

- they should be subjected to on-going scientific evaluation after they have been implemented and
- all restrictive precautionary measures should be provisional and be limited in time with an obligation for review and revision within a fixed time period.

The appropriate and efficient application of the precautionary approach depends on regulatory authorities carrying out rigorous science-based approvals for all new products and new product uses. This is the best way of ensuring that risks are assessed and managed properly and that precautionary measures are not misused.