



**Pesticide
Action
Network**
Europe



**Towards a just, healthy and
sustainable world**

wecf is now called women **engage** for a common future

Minister Carola Schouten
Ministry of Agriculture, Nature and Food Quality
Bezuidenhoutseweg 73
2594 AC The Hague
Netherlands

Brussels, 19 December 2017

Open Letter: Implementation of Sustainable Use of Pesticides Directive and Revision of National Action Plan

Dear Minister Schouten,

Pesticide Action Network Europe (PAN Europe) and Women for a Common Future (WFCF) have been following the debate on the implementation of the Directive 2009/128/EU on Sustainable Use of Pesticides (SUD); we are therefore pleased that DG SANTE has published its [evaluation report](#).

We are also pleased to notice that you, as part of the roundtable held in the EU Council on agriculture (on 6 November 2017), confirmed engagement towards ensuring serious implementation in the future.

We remind you that this evaluation report was due on 26 November 2014 (SUD Art. 4.3) and that it is now time to take serious action to recover the time lost in the SUD implementation.

We recognize that many member states have made progress in the field of checks on spraying equipment, etc. We see that the main achievements, since the National Action Plans (NAPs) were prepared in 2011-12, are decisions in Netherlands, France, Luxembourg and Belgium to stop using pesticides in public areas.

We furthermore welcome the recommendation in the Commission's evaluation report calling for *'Member States need to improve the quality of their plans, primarily by establishing specific and measurable targets and indicators for a long-term strategy'*. We also note with interest that the report says: *'Integrated Pest Management is a cornerstone of the Directive, and it is therefore of particular concern that Member States have not yet set clear targets and ensured their implementation, including for the more widespread use of land management techniques such as crop rotation'*.

We have read [the fact finding report](#) that the European Commission has written after having carried out a mission in the Netherlands in 2017, and we do believe that the Commission's recommendations (raised in italic above) regarding the quality of national action plans and the uptake of IPM is of high relevance to the Netherlands.

Despite the fact that much of the statistical reporting from the fact-finding report relates to outdated statistics from 2012 and earlier, **we are very pleased to note that¹ the Netherlands has a pesticide monitoring system** in place asking farmers to keep ‘*records of all IPM measures taken (Annex III of the SUD), including: crop rotation, use of resistant or tolerant planting material, including seeds, biological, physical and nonchemical methods, which must be given preference, selection of PPPs based on risks for environment and humans, monitoring of harmful organisms, use of warning and forecasting systems and resistance management*’. We would like this to **become a model for other Member States** and hope that there will be a public debate about it, when its effectiveness will be evaluated in 2018.

On the other hand, we believe that the Netherlands still has **a large number of areas where progress is needed**. According to the findings of [the fact-finding report](#), **we would like to draw your attention to unsatisfactory facts, such as:**

- The NAP of the Netherlands **does not set up quantitative objectives, targets, measures or timetables**, but it contains some qualitative targets and, in particular, specific measures most of which are related to the implementation of Articles 11 and 12 of the SUD.²
- The general principle of IPM seems to have been included into cross compliance, but has later been removed and since then is not being monitored³.
- There are tools serving the purpose of internal evaluation of NAP implementation, however, this **information is not made available to the public** or any other interested parties to a large extent.⁴
- The revision of NAP will take place in 2018, which is a delay of one year beyond the five-year deadline for review under the SUD.⁵
- It is not satisfying that the Dutch authorities have set **specific criteria for water quality which are not even able to ensure compliance with EU regulations**.⁶ The quantitative objectives set for reduction of the exceedances are not adequate enough to deliver water quality and water protection under related EU Directives⁷.

We read with interest the Netherlands Food and Consumer Products Safety Authority (NVWA) survey results⁸, especially where they consider: ‘*the plant protection monitor could be a tool for continuous monitoring of IPM implementation and subsequent improvement*’. It is also very interesting that this survey also shows, ‘*in general, IPM measures were used to a higher extent in greenhouse vegetable production and to a lesser extent in tulip production and arable crops. Results from the survey demonstrated that some IPM measures were not implemented to their full potential*’.

However, **it is worrying to read in the fact-finding report that⁹ ‘IPM is no longer a condition under national legislation, it is not currently checked during cross compliance checks’, and ‘there was a transition to the so called “Top sector approach”**. Research

¹ [DG Sante Final Report of the Fact-Finding Mission](#) in the Netherlands, page 18, point 73

² Fact finding report, Page 5, point 11

³ Fact finding report, page 18, point 72

⁴ Fact finding report, Page 6-7, points 17 and 18

⁵ Fact finding report, Page 7, point 18

⁶ The EU Water Framework Directive 2000/60/EC

⁷ Fact-finding report, page 6, point 15.

⁸ Fact-finding report, page 19, points 75-77

⁹ Fact finding report, page 18, Point 72

*objectives included: resilient crops; resilient cropping systems; smart, innovative technologies; effective and sustainable crop protection measures and integration*¹⁰. *‘Advisory services with regard to pest control/PPP application in agricultural production are provided by private bodies. In addition, there are some publicly and/or privately funded projects aiming at providing advice and encouraging growers to implement IPM’*¹¹.

In this context, we would like to remind you that:

- [According to Eurostat](#), on average in the period 2011-2015 the Netherlands has had a total annual sale of pesticides at 10.000.000 kg of active substance.
- The Netherlands is **too dependent on pesticides** as is explained in the [factsheet on 2014-2020 Rural Development Programme for the Netherlands](#) which, among others, says that *‘Farming is large-scale and intensive with undesirable effects on the environment and climate. Productivity and yields per hectare are high. Farmers use a high level of fertilisers and plant protection products (75% of the agricultural land is classified as high input per hectare, compared to an overall average of 26% in EU-28 as a whole). The intensive nature of Dutch agriculture inevitably puts high pressure on certain ecosystems.’.... ‘If the Netherlands is to reach its environmental goals, it is essential that it improves the environmental sustainability of if agricultural sector...’. ‘The ability to meet the objectives of the Water Framework Directive also depends on the agricultural sector. Although water quality and the condition of Dutch waterways is improving, more needs to be done’.*
- The Netherlands, [according to PAN Europe’s calculations](#), is one of the Member States receiving the **highest per hectare premiums within the Common Agricultural Policy (CAP)** and is also the Member State using the highest amount of pesticides per hectare - we believe that changes are needed in this respect.
- While we do recognize that a research project is being undertaken to find out the pesticide exposure of people living next to flower bulk production, we wish to draw your attention to the fact that **40.000 Dutch people** signed the [European Citizens Initiative to ban glyphosate](#) in less than five months.

We have noted that, in the intervention at the Council, when speaking about SUD implementation, you, Minister Schouten, mentioned: *‘The Netherlands, like many other Member States, has adopted various measures to reduce the use of pesticides outside agriculture, so we should be more concerned about a sustainable use in agriculture. We need to increase research on non-chemical alternatives to pesticides in order to provide useful alternatives to farmers. We need to market them more quickly and use them more widely. Furthermore, it would be necessary to increase professional training for farmers’.*

While we do agree with you about the importance of **making non-chemical alternatives become more accessible more quickly and of using them more widely**, we nonetheless do believe that what is needed to **make the Dutch model of farming less dependent on pesticides** is to develop a model much more focused on **nature-based solutions**.

We call on you, Minister Schouten, to take the following actions for a transition towards low-impact farming systems, making sure that the revised National Action Plan will be prepared soon, that environmental and women’s groups will be involved in the preparation of the revised NAP, and that the new NAP will set quantitative reduction targets of 50% to be obtained in 10 years, following the model from France, and if needed accompanying this by establishment of a pesticide tax (as has been done with

¹⁰ Fact finding report, page 19, Point 79

¹¹ Fact finding report, page 20, Point 84

great success in Denmark) and that serious considerations be launched on how to protect water from pesticide contamination.

Finally, especially related to the **Dutch model of farming**, we call on you to:

- Shift focus in the agricultural sector **from short-term fixes focused on competitiveness towards a longer-term reflection on how to start working with nature again**. We call on the promotion of a systems-based approach in the **uptake of IPM** (based on forgotten practices like crop rotation first), as well as its reintroduction into cross-compliance, and as part of that we recall the economic and ecological values of delivering agronomy as part of a long-term strategy, focusing attention on the uptake of nature-based solutions.
- Build independent advisory services in the Netherlands again, as we noticed with regret that the **IPM support mechanism** in the Netherlands is very much based on private rather than public support, with both farm advisers, forecast and early warnings models and demonstration farms: all being managed with private rather than public engagement. We believe this is a dangerous development, and would propose that you consider introducing a **pesticide taxation** to raise the needed funding allowing such tools to be developed independently.
- Give increased attention to the **development of the organic sector** in the Netherlands, [which today seems to have been developed only slowly](#). The development of the organic sector in the Netherlands can be an inspiring model for others to follow, therefore serving among others as demonstration farm and stimulation for others to follow.

We notice that the evaluation report for the Netherlands highlights that one of the sectors having most difficulties in the uptake of IPM is the Dutch cereal sector. We are therefore pleased to inform you that PAN Europe in collaboration with International Organisation of Biological Control (IOBC) and International Biocontrol Manufacturer Association (IBMA) will be organising its 6th [symposium in Brussels on 31 January 2018](#), on the implementation of the SUD with this year's specific topic being the uptake of Integrated Pest Management working with nature in cereal production. This symposium will be web-streamed among others from our homepage in English, French and Italian, and we propose you take this opportunity to involve the Dutch Farm Advisory Systems in kicking off independent exchanges on this matter.

Thank you in advance for your consideration of these points.

Yours sincerely,



Francois Veillerette

On behalf of PAN Europe and Women for a Common Future (WFCF)