

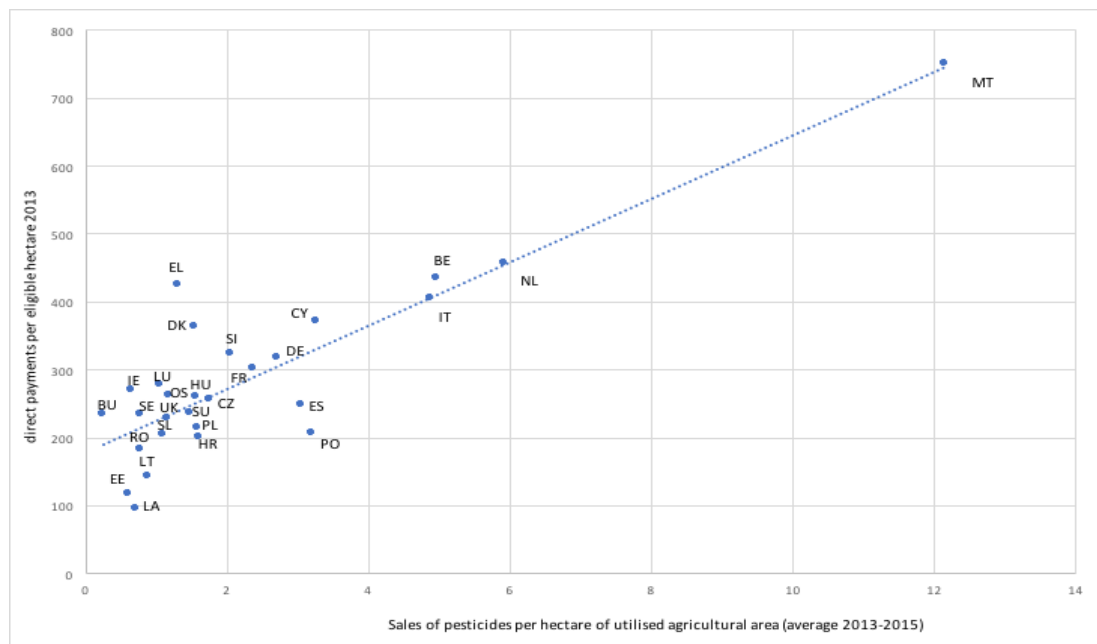


Inspiration note for the development of EU's Common Agricultural Policy: Why the CAP is broken on pesticides?

"The more I learned about the use of pesticides, the more appalled I became... What I discovered was that everything that meant most to me as a naturalist was being threatened, and that nothing I could do would be more important."
 Rachel Carson, 1962

In seven points, this reflection paper shortly questions the CAP payments relating to pesticide issues. One of the major issues with the current CAP is that there are no mandatory instruments to encourage a transition toward low-input farming.

Almost 400,000 tons of active substance are sold in the EU to be sprayed on Europe's fields each year. Pesticide Action Network Europe (PAN Europe) has made a simple overview showing the link between pesticide sale and direct payments of the Common Agricultural Policy (1) (2).



We dare to question whether it is logical that tax payers' money pay the highest direct payments per hectare to Member States with the highest sale of pesticides per hectare?

One of the most relevant problems with the current CAP, among others, is that there are no mandatory instruments to encourage a transition towards low-input farming, due to the following shortages:

No requirement for farmers to have a plan on pesticide reduction: there are no mandatory requirements in the CAP specifying that, in order to receive direct payment, farmers have to make plans to reduce pesticide use, as well as to prove that s/he is applying integrated pest management despite this having been mandatory for farmers to apply since January 2014 according to the EU Directive on Sustainable Use of Pesticides (SUD). In the

2013 CAP reform, Member States agreed to define mandatory rules to ensure uptake of integrated pest management, but so far very little has been done to ensure uptake of this.

Direct payments despite pesticide derogations: EU Regulation no 1107/2009 concerning the sale of pesticides is part of the so-called statutory mandatory requirements of the cross compliance meaning that, in order to receive direct payments from the CAP, in principle farmers can only use pesticides approved for sale in EU. However, in reality Members States often ask for 120-day derogations to this regulation to carry on using pesticides which should otherwise be banned. This means that farmers often keep using banned pesticides while obtaining direct payments at the same time.

The Farm Advisory System is neither visible nor necessarily independent: as of 2015, farmers have a right to be informed about all aspects of integrated pest management as defined in the EU Directive on the sustainable use of pesticides, including monitoring and pest programmes and uptake of alternative techniques. Unfortunately, the visibility of the Farm Advisory System remains limited with the result that many farmers continue being informed by chemical companies, while the body which should be more independent and should promote alternatives to chemical pesticides remains relatively unknown.

Uptake of alternative techniques to pesticides is not directly targeted in the Rural Development programs, and the baseline remains questionable: MS can encourage reductions in pesticide use e.g. by supporting voluntary integrated farming methods (incl. voluntary elements of Integrated Crop Management) through the agri-environment and climate schemes. Some MS are already doing so, as some are encouraging crop rotation while others are encouraging uptake of biological control, but no MS seem to offer farmers complete support packages, and it is still unclear how MS have updated their baseline taking into account the introduction of the general principles of IPM.

The baseline for pesticide use reduction in the regulation on fruit and vegetables remains questionable: MS can encourage reductions in pesticide usage, e.g. under the so-called Integrated Production as part of the environmental actions of the operational programs on fruit and vegetables. Some MS are already doing so, but it remains to be seen how the introduction of the general principles of IPM will influence baselines of such schemes.

Real risk management tools that encourage prevention rather than (posthumous) cure are not being promoted: One of the key arguments against IPM is the higher level of risk taken by the farmer during the transition toward more sustainable systems. While the rural development policy does allow Member States to offer farmers financial support to assist farmers in the move towards real IPM, this potential is not being exploited to the full in the CAP.

(1) The table is based on Eurostat, except estimates for pesticide sale in Cyprus and Luxembourg are classified by the national government as confidential, and therefore numbers appearing in the tables are estimated by PAN Europe.

(2) The most active substance sold and used in Malta is Sulphur, which covers around 65% of total sales and also around 90% of total active substances used (from Eurostat)

In the following reflection papers on which CAP for the future we will reflect on how to get more systemic thinking, moving away from offering single measures to, instead, start offering packages of measures assisting farmers financially and technically in the transition towards sustainable farming systems.

Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together consumer, public health, environmental organisations, and women's groups from across Europe. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives.

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