

# PESTICIDE ACTION NETWORK EUROPE

IPM  
CAMPAIGN

PESTICIDE  
TAXATION

VOICES OF  
PESTICIDES

BEES

PESTICIDE  
FREE  
TOWNS

SUPD  
DEVELOP-  
MENTS

GLYPHOSATE

COURT  
CASES

ENDOCRINE  
DISRUPTORS

AGRI-  
CULTURE

HUMAN  
HEALTH

POLICY

NATURE

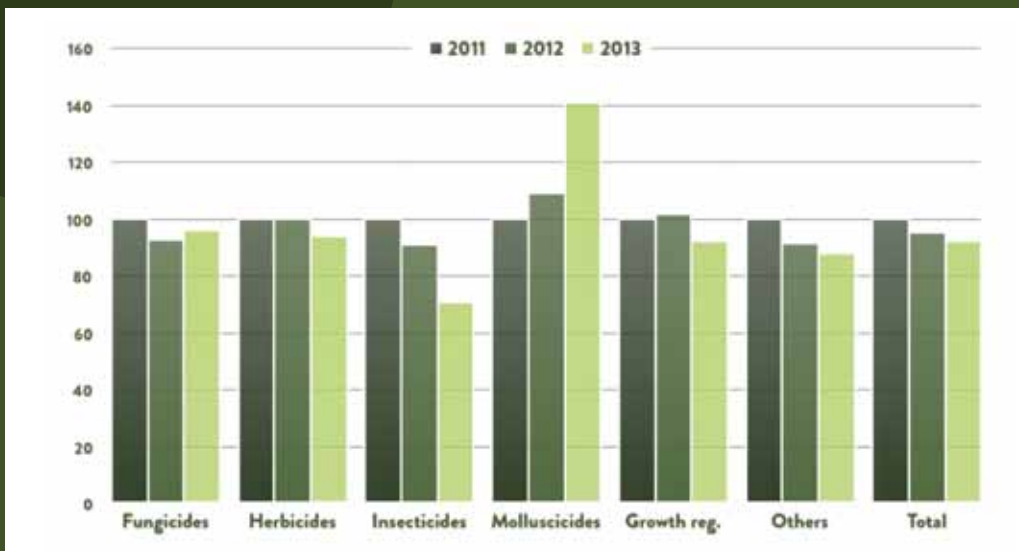
TOWNS

VOICES

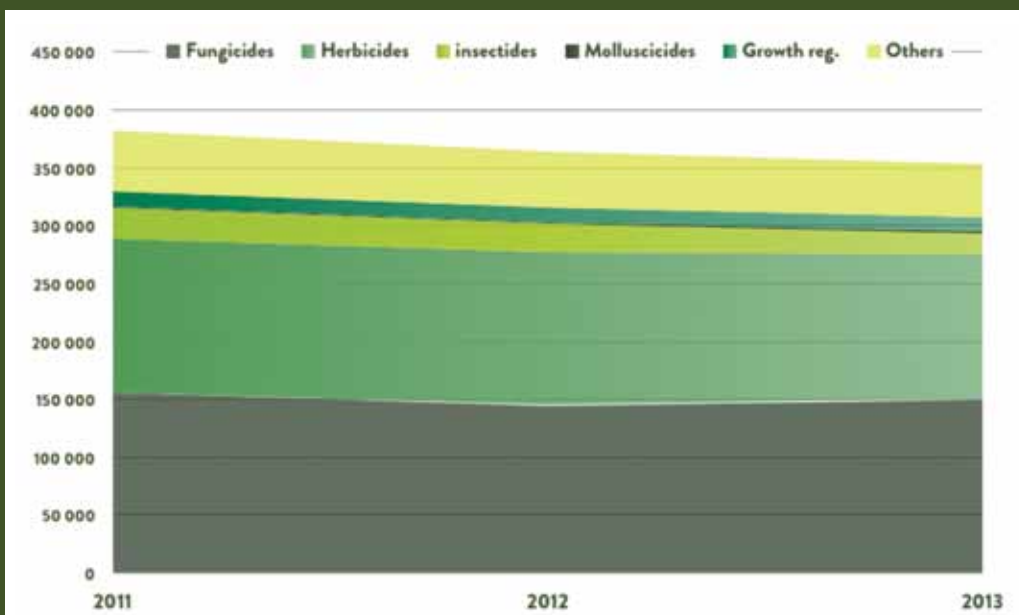
2015 PAN  
EUROPE  
ACTIVITY  
REPORT

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### PESTICIDE SALE 2011-2013 – BASELINE YEAR 2011=100



### TONS OF PESTICIDES SOLD IN 2011-2013



# WHO WE ARE

Pesticide Action Network (PAN) was founded in 1982 and is a network of over 600 non-governmental organisations, institutions and individuals in over 60 countries worldwide working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives. Its projects and campaigns are coordinated by five autonomous Regional Centres.

PAN Europe is the regional centre in Europe. Located in Brussels, it was founded in 1987 and brings together 34 consumer, public health, and environmental organisations, trades unions, women's groups and farmer associations from across 21 European countries.

PAN Europe's vision is of a world in which high agricultural productivity is achieved by truly sustainable agricultural production systems in which agrochemical inputs and environmental damage are minimised, and where local people control local production using local varieties.

## WHY THE FIGHT ON PESTICIDES IS IMPORTANT

All of us are exposed directly or indirectly to pesticides and other agrochemicals- farm workers and their families most of all, but every consumer will be exposed to dozens of different pesticides every day through food and the environment. There are particular concerns for the strong effects of pesticides on young children and the unborn.

Many pesticides are known for their risk to cause cancer, change DNA or for their harm to reproduction<sup>1</sup>. For many pesticides there is good evidence for endocrine disrupting properties. The consequences of endocrine disruptor exposure (cancer, cognitive and sexual disorders, mental disorders) are rising in society<sup>2</sup> and the contribution of pesticides to these effects is likely<sup>3</sup>. Pregnant women and children are especially vulnerable to pesticide exposure. Pesticides are products designed to kill or repel undesired living organisms. Although each pesticide is meant to target a certain pest, most can have negative side effects on non-target species, including humans. When used in agriculture, they often contaminate the air, water, soil, wildlife, and beneficial insects (like bees and predators of insect pests), soil micro-organisms, and they end up in our food too.

## PESTICIDE USE IN EU'S AGRICULTURAL SECTOR

There is dangerous overuse of pesticides taking place. A study shows that, in France, farmers could reduce their pesticide use by 30% without reducing their yield. In 2013, no less than 353 325 tonnes of pesticides were sold in Europe, with the vast majority used in the agricultural sector.

### HOW IS PAN EUROPE FINANCED

In 2015 we managed to maintain funding to work on chemicals and pollinators, obtaining 1-2 new agreements from our existing donors including a LIFE+ grant which enables our work with European Institutions. We obtained new funding to work on a more European approach on pollinators.

In 2015, we also managed to attract minor funding from private companies and from Belgian Public Administrations (IBGE and SPW) to kick off a campaign on towns, whose success resulted in an even bigger grant from a new funder (Lotterie Belge) to follow, and we now have funding for our campaign on pesticides free towns for 2016.

Finally, in December 2015 we managed to obtain a grant from a new donor in the UK to work on agriculture and food.

1 European Parliament study PE 408.559, the benefits of strict cut of criteria on human health in relation to the proposal for a regulation concerning plant protection products (2008).

2 Theo Colborn, Environm. Health Perspect. 112 (9): 944 (2004).

3 Theo Colborn, Environm. Health Perspect. 114 (1): 10 (2006).



**THE MORE I LEARNED ABOUT THE USE OF PESTICIDES**, the more appalled I became... What I discovered was that everything which meant most to me as a naturalist was being threatened, and that nothing I could do would be more important.

Rachel Carson – 1962

Biologist and Author *The Silent Spring*

**SOME FORMS OF POLLUTION ARE PART OF PEOPLE'S DAILY EXPERIENCE.** Exposure to atmospheric pollutants produces a broad spectrum of health hazards, especially for the poor, and causes millions of premature deaths. People are sick, for example, from breathing high levels of smoke from fuels used in cooking or heating. There is pollution that affects everyone, caused by transport, industrial fumes, substances which contribute to the acidification of soil and water, fertilizers, insecticides, fungicides, herbicides and agrotoxins in general. Technology, which, linked to business interests, is presented as the only way of solving these problems, in fact proves incapable of seeing the mysterious network of relations between things and so sometimes solves one problem only to create others.

Pope Francis, Encyclical letter – June 2015

# WHAT WE DO

PAN Europe works to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. PAN Europe is committed to bringing about a substantial reduction in pesticide use throughout Europe. Reducing pesticides (including biocides) is critical for the improvement of public and workers' health, protection of the environment, the sustainability of future farming.

## PAN EUROPE ACTIVITIES INCLUDE

- Encouraging citizens to make their voices heard
- Being involved in the EU decision making process
- Disseminating information and raising awareness on pesticide problems, regulations and non-chemical alternatives
- Creating reports, publications, press releases, and blog contributions to inform civil servants and the general public through our websites and social networks
- Disseminating articles through a public newsletter (4000 readers) inspiring not only policymakers but also citizens to become active themselves
- Amplifying the voices of those affected by pesticides
- Lobbying politicians on the updates of scientific research on the adverse effects of pesticides
- Organizing workshops and conferences
- Promoting dialogue for change among government, private sector and civil society stakeholders

## WHAT WE DO TO ENSURE RIGOROUS IMPLEMENTATION OF THE ABOVE MENTIONED EU REGULATIONS

PAN Europe is involved in the EU's decision making process. We are members of a Standing Committee of the European Commission on Biocidal Products, of the advisory groups on the food chain and animal and plant health, of the Civil Society Dialogue Groups of DG Agri. We are also members of a number of technical working groups of the European Commission, of the European Food Safety Authority (EFSA); and finally in a number of international working groups within the Organisation for Economic Cooperation and Development (OECD).

### WITHIN THE FIRST TWO WEEKS OF 2015, PESTICIDE-FREE-TOWNS.INFO WAS VISITED 151 TIMES BY 122 VISITORS, 20% RETURN RATE FOR VISITORS

- We aimed to increase by 10% the number of newsletter subscribers, 422 signed up which is 10%
- We aimed at getting 1500 but obtained 1962 likes on facebook and a ranging of 4,9 out of 5 possible stars
- We aimed at 300 followers on twitter by the end of 2015, we got 452 followers (@europepan)
- 29 quotes of PAN in the press
- 17 press releases sent out in 2015
- Increased visibility and knowledge of PAN work topics to Brussels citizens

**WHEN TALKING ABOUT AGRICULTURE A EUROPEAN WIDE STUDY FROM 2010 SHOWS:** *Of the 13 components of intensification measured, the use of insecticides and fungicides had consistent negative effects on biodiversity.*

*If biodiversity is to be restored in Europe ... there must be a Europe-wide shift towards farming with minimal use of pesticides over large areas.*

Geiger, F. et al. – 2010

Persistent negative effects of pesticides on biodiversity and biological control potential on European farmland. Basis and Applied Ecology

**WE HAVE A CHRISTMAS TREE FARM** *surrounded by huge agricultural fields. Some of these fields are over 250 acres in size. We grow mature trees next to young trees and mix a range of different types and varieties. Our plantation is surrounded by hedges with rich flora and fauna.*

*Since about ten years ago we have observed intensification in the use of pesticides on the surrounding fields, associated with plough-less tillage and non-compliance of balanced crop rotation.*

*We have informed our neighbour farmers (conventional farmers) about the damage to our fruits, vegetables and Christmas trees caused by the use of pesticides. We have also documented the damage. The bird population is dwindling, and bees are now very rare.*

Johannes Meisser – Near Schwerin, Germany

## CURRENT STATE OF EU PESTICIDE POLICY: A SNAP SHOT

There are currently several major concerns with regard to pesticide policy. We are concerned because:

- The European Commission was meant to evaluate Member States' implementation of the Sustainable Use Directive on pesticides in November 2014, but the report is being seriously delayed and is now expected for publication in June 2016
- The European Commission has delayed the re-evaluation of the partial ban on neonicotinoid from 2015 to 2017, while at the same time having authorised two new neonicotinoids in 2015, despite the lack of data on their toxicity to pollinators
- The definition of criteria for endocrine disrupting chemicals has been delayed from 2013 to 2016. The expected criteria offer little to no protection of human health and the environment
- Finally, the European Commission keeps closing its eyes on nearly systematic misuse of the so-called **article 53** derogation system

So in short the European Commission has not been very proactive on implementation of EU Regulation 1107/2009 on authorisation of plant protection products and EU Directive 128/2009 on Sustainable Use of Pesticides.

### OMBUDSMAN'S DECISION

PAN Europe has been worried about this lacking implementation for a while and consulted the European Ombudsman (complaint 12/2013/MDC). The verdict came out in June 2015 saying:

*the Ombudsman considered that the Commission, which has the duty to ensure that the active substances it approves are not harmful for human health, animal health, or the environment, may be too lenient in its practices and might not be taking sufficient account of the precautionary principle.*

The Ombudsman requested the Commission to submit to her a report covering a number of specific points within two years of her decision.

PAN Europe hopes that this will pressure the EC to correctly implement Rule 1107/2009.

PAN Europe is not alone in worrying about this lacking implementation. A number of members of the European Parliament have submitted written questions to the European Commission asking for serious implementation:

- Written question E-014243-15 by Paul Brannen (S&D), Benedek Jávor (Verts/ALE), Karin Kadenbach (S&D), Alojz Peterle (PPE), Pavel Poc (S&D), Christel Schaldemose (S&D), Claudiu Ciprian Tănăsescu (S&D), Marco Zullo (EFDD) on Integrated Pest Management
- Written question E-000056-15/2015 by Alojz Peterle (PPE), Claudiu Ciprian Tănăsescu (S&D), Pavel Poc (S&D), Nicola Caputo (S&D), Karin Kadenbach (S&D), Benedek Jávor (Verts/ALE), Marco Zullo (EFDD), Christel Schaldemose (S&D), Paul Brannen (S&D) on Aerial spraying of pesticides
- Written question E-000225-16 by Bart Staes (Verts/ALE) on Compatibility between Regulation (EC) No 1107/2009 and Directive 2009/128/EC
- Written question E-005519/2015 by Piernicola PEDICINI on Buffer zones and non-spraying zones for pesticides



**THE CHAIRMAN'S CONCLUSIONS OF THE SYMPOSIUM ON FEEDING EUROPE WHILE REDUCING PESTICIDES DEPENDENCY, AMONG OTHERS, SAYS:**

*The benefits of feeding Europe while reducing pesticide dependence will be widespread and seen across the entire food industry from farmer and worker to consumer, from producers of plant protection products to those responsible for the provision of clean drinking water, from biodiversity to soil health.*

*The regulatory mechanisms are largely in place, the benefits documented and the challenges still posed known. Yet, while progress has been made, there is a huge road to be travelled to achieve a commonly shared vision. Civil society is well entitled to ask, given that the end point is agreed, why is there such slowness in getting there and to question how serious is over 20 years of EU commitment to sustainable agriculture and 25 years of relevant pesticide legislation.*

*Michael Hamell – Associate Professor of Agriculture  
University College Dublin*

*In the food business, there is a tremendous amount of misinformation. If you want to feed your family healthy food, you have to ask a lot of questions.*

Patagonia, Unbroken ground – 2016



# PAN EUROPE & THE SUSTAINABLE USE DIRECTIVE

The results of PAN Europe's prolonged campaign to set quantitative targets and timetables for reducing pesticide dependency was the EU Directive on Sustainable Use of Pesticides (SUDP) approved in 2009. While this directive does set a number of quantitative targets and time tables, implementation is lacking both at EU and at the Member State level, and standard indicators are still being discussed.

## ACCORDING TO EU DIRECTIVE 2009/128/EC SHALL MEMBER STATES:

- Set up quantitative objectives, targets, measures and timetables to reduce pesticides use' by developing national action plans by November 2012
- Take all necessary measures to promote low pesticide-input pest management, giving wherever possible priority to non-chemical methods, so that professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available for the same pest problem as from 1 January 2014

Unfortunately, **the Commission implementation report on the SUDP NAPs has been delayed for more than a year giving a worrying signal of lack of urgency in addressing the pesticides issue and, by extension, related issues of human health, water and biodiversity protection.** Positive cooperative implementation of the SUDP has to be the goal of all involved parties. Implementation reports on legislation are required on a regular basis and delay in the 2014 report needs to be avoided in 2018.

The SUDP provides a policy framework to apply agronomic practices and principles, like crop rotation, which minimize the use of pesticides. Unfortunately, the Member States implementation reports required under the SUDP appear to suggest little or limited ambition. PAN Europe is active in pushing the European Commission to be more aggressive in pursuing Member States to take action on the SUDP.

### EUROPEAN UNION LAWS OF INTEREST TO PESTICIDES

- Regulation (EC) No 1107/2009 concerning the placing of plant protection products on the market
  - Directive 2009/128/EC establishing a framework for sustainable use of pesticides;
  - Regulation (EC) No. 1185/2009 concerning statistics on plant protection products;
  - Regulation (EC) No. 396/2005 on maximum residue levels of pesticides in or on food and feed;
  - Directive 2000/60/EC establishing a framework for water policy;
  - Directive 2009/90/EC on strategies against chemical pollution of surface waters
  - Directive 2008/105/EC on environmental quality standards (also known as priority substances directive)
  - Regulation (EC) 1305/2013 on Rural Development of the CAP
  - Regulation (EC) 1306/2013 on Horizontal issues such as funding and controls of the CAP
  - Regulation (EC) 1307/2013 on Direct payments for farmers of the CAP
- The EU will soon develop an EU communication on the non-toxic environment  
The EU's Green Capital award will as from 2017 also give attention to pesticide use in towns

*Pollutants in some of Europe's freshwaters have led to detrimental effects on aquatic ecosystems and the loss of freshwater flora and fauna. Aside from eutrophication, which remains widespread, chemicals with endocrine disrupting properties have been shown to trigger feminising effects in male fish, raising implications for their fertility. Pesticides and metals can be toxic to aquatic life, while concern is growing about the effects of chemical mixtures found in Europe's more polluted waters.*

European Environment Agency – State and Outlook 2010  
Freshwater Quality

*Food is regarded as the main source for current-use pesticide exposures in the general public. However, pesticides can also be inhaled and absorbed through the skin, particularly by people handling them directly during pesticide application or indirectly when the crop is harvested or processed. The former, in particular, could lead to high exposures.*

UNEP State of the Science on Endocrine Disrupting Chemicals  
Chapter 3. Human and wildlife exposure to EDCs

# INTEGRATED PEST MANAGEMENT

## WHAT IS INTEGRATED PEST MANAGEMENT (IPM)?

IPM can be defined as *a durable, environmentally and economically justifiable system in which pest damage is prevented through the use of natural factors limiting pest population growth and, IF NEEDED, supplemented with other preferably non-chemical methods.*

Many aspects of IPM are not new and have been practiced by generations of farmers as part of routine crop husbandry. Practices such as crop rotation, use of resistant varieties, under sowing, intercropping, protection of pollinators (and some predators), physical and mechanical weed control, build up and enhancement of soil organic matter, soil structure and water retention capacity have been part of good farm practice for centuries and are key principles of IPM.

The EU Directive on Sustainable Use of Pesticides (SUDP) states that Member States shall take all necessary measures to promote low pesticide-input pest management (including IPM) giving wherever possible priority to non-chemical methods, so that professional users of pesticides switch to practices and products with the lowest risk to human health and the environment among those available etc.

## PAN EUROPE'S ACTION ON IPM

To increase awareness among policy makers about how IPM serves as a viable alternative to chemical-based agriculture, PAN Europe-IOBC-IBMA created an exhibition **IPM – Working with nature**

This exhibition has so far been shown in the three Directorates General of the European Commission (DG AGRI, DG SANTE, DG ENVI) as well as the Federal Belgium Ministry of Health and Environment. To accompany this exhibition, the brochure **IPM – Working with nature** has been printed in 4.000 copies in English and has been distributed entirely.

## SYMPOSIUM FEEDING EUROPE WHILE REDUCING OUR DEPENDENCY ON PESTICIDES

In 2015 PAN Europe also organised the 4th European symposium with Greenpeace, Eurocoop, IOBC and IBMA promoting alternatives to pesticides in an EU institutions.



The PDF of this presentation is available for free download on our website pan-europe.info

**YOU CAN NOW ADD PESTICIDE-FREE WEED CONTROL** to Copenhagen's already long list of green credentials, which includes being a cycling paradise, having perfect water, and smart lighting.

Last month, in an official letter to the Pesticide Action Network, Morten Kabell, Copenhagen's mayor for technical and environmental affairs, offered another reminder of why the city deserved its 2014 Green Capital title. According to Kabell, Copenhagen has avoided the use of pesticides in public areas for many years now:

*The city has such good experience with alternative methods of managing weeds by now, that this rules out the reintroduction of pesticides.*

*The technical and environmental administration has deep knowledge of alternative methods [of weed control] and is willing to share this with others, so that we can jointly protect our environment and our drinking water.*

*Chemical weed killing is becoming redundant, due to new knowledge together with well-known alternative methods and a changed consciousness about biodiversity. The products could, according to us, be banned completely.*

*Ljubljana, this year's European Green Capital, has expanded its green spaces over the past decade and takes great pride in its beekeeping heritage. Studies have linked the use of certain common pesticides to the global collapse of apian colonies*

*Morten Kabell – Copenhagen's mayor for technical and environmental affairs*

# PESTICIDE FREE TOWNS

Pesticides are not only used in farms to produce food but also in the towns and cities in which we all live. They are used in green areas of schools, playgrounds, kindergartens, parks, private gardens, sport fields, sidewalks and cemeteries. Workers that apply pesticides must wear protective clothing, yet immediately after application, kids and families come play, picnic, and lounge freely on the grass where they come in direct contact with the pesticides.

PAN Europe's evaluation of the level of implementation of the Sustainable Use Directive (SUDP) from 2013 (*available on [pan-europe.info](http://pan-europe.info)*) demonstrates that Member States' lack of effort to reduce pesticides must sometimes be compensated by decisions at town-level. This elimination of pesticides at the town level is a critical step in the development of more sustainable and green towns.

## PAN EUROPE'S ACTIONS ON PESTICIDE-FREE TOWNS

With much activity on pesticide-free towns in Belgium, PAN Europe organised a conference in Brussels, demonstrating the best-practices of pesticide-free towns in the three Belgian regions (Brussels, Flanders and Wallonia). The Netherlands and France all have specific targets and time-tables on how to become pesticides-free including how to combat invasive species in parks. This conference was organised together with ICLEI - local governments for sustainability as well as with the Belgium NGOs : Velt, Inter Environment Bruxelles, Greenpeace, Natagora, Adalia, Gestion Differentie, and Apis Bruoc Sella on Monday the 8 June 2015 – the first day of the organic week.

From there PAN Europe has managed to kick off a full campaign:

- Special pesticide-free towns webpage in four language versions, [pesticide-free-towns.info](http://pesticide-free-towns.info)
- European conference for Belgium municipalities and European NGOs, with a number of high level speakers from Belgium, France and Netherlands highlighting good examples of pesticides free towns, including how to fight invasive species with alternatives to pesticides
- Map of Europe collecting maps of pesticide free towns in Belgium, Denmark, France and the Netherlands identifying a number of pioneering towns that others could learn from.
- Questionnaire to Belgian municipalities, also asking questions on how to fight invasive species in parks offering a list of alternatives to pesticides, to be used by other countries
- 1 visit for European and National NGOs showing a pesticide-free park in Brussels, 1 workshop for Belgium NGO workshop to increase collaboration, 1 workshop for our members on sale of pesticides to private persons were organised
- Written testimonies from 61 concerned citizens and victims of pesticides from across Europe (mentioned in point A)
- 1000 awareness raising events on the exposure to pesticides
- Spread of articles on social media (included in work programme on organisation developments)



**THE EU GREEN CAPITAL AWARDS START TO RECOGNISE THAT BEING PESTICIDE-FREE IS ALSO A TOPIC OF ENVIRONMENTAL IMPORTANCE**

With thanks to the Belgian lottery for their financial support



**I HAVE BEEN A BEEKEEPER FOR 35 YEARS.** I live in Sombreffe (Namur province). My bee hives are located around my facilities in 19 apiaries of around 12 hives each.

In general, I lose 10-15% of my hives during the winter. This year, it is a catastrophe: I have lost more than 40%.

Examining the losses apiary by apiary, I observed that some apiaries had only 10% losses while others had lost 80% of their honey bee colonies. Apiaries located in woods suffered less than the ones in agricultural area. I thus think the environmental factor plays a role: biodiversity loss? Yes, my bees have less flowers to visit than in the past but new pesticides used in agriculture are also probably a problem.

Robert Lequeux – Farmer, Belgium

**I AM THE PARENT OF A CHILD WHO RANDOMLY DEVELOPED SEVERE ECZEMA** and was hospitalised following a trip to the local play park at 18 months old..... the answer was glyphosate.

When WHO reclassified glyphosate last week, I was grateful that I'd realised what had caused my child's pain; severe eczema is one thing, cancer would've been another.

As a parent of a child who has suffered due to this dreadful chemical, I know I'm just another person who is appalled at the negligence of those who allow this and many other dangerous products into the world.

Sarah Patterson – Mother, England

# BEES

Both in 2014 and 2015, Member States have approved a number of derogations on the partial neonicotinoid ban, each time with surprisingly little resistance from other Member States and the European Commission (standing committee of DG SANTE), limiting the spread of up-takes of the many alternatives already ready to use, and therefore blocking the development of more sustainable farming systems. Furthermore, Member States that provide derogations to their farmers do not respect the EU rules on provision of derogations (no year-after-year derogation, verification of its agronomic and economic necessity, justifications provided to the Commission, etc.).



Instead of reviewing the ban in 2015 as we expected, the European Commission “initiated” the review of the ban last year. It sent a mandate to EFSA to collect all new scientific data and evaluate it. EFSA announced it would publish its review of the new scientific data by January 2017. Only then will DG Sante initiate discussions with the Member States to decide whether a review of the ban will take place.

Meanwhile, two new neonicotinoid pesticides were approved by the European Commission in 2015 (first Sulfoxaflor and then Flupyradifurone). PAN Europe reacted and decided to start a court case before the European Court of Justice against Sulfoxaflor authorisation and we are currently collecting scientific evidence and arguments for our lawyer in the process.

The Guidance Document (GD) on the risk assessment of plant protection products on bees, published by EFSA in 2013 is still not implemented at EU-level. This document would permit an updated risk assessment in order to take into account all the effects proposed by pesticides on bees (chronic toxicity, sublethal toxicity, etc.), including wild bees such as bumble bees. The GD was actually blocked at DG Sante for political reasons and is now under discussion in order to have it implemented in the entire EU. We expect its implementation to help reduce the number of authorised pesticides (including fungicides, of which there is ever growing evidence of chronic toxicity to bees).



In Fall 2015, PAN Europe was invited to join a meeting in Washington DC to share our EU experience with American NGOs that were gathering to discuss their strategy to get rid of neonicotinoids in the US.



## PAN EUROPE'S ACTIONS ON BEES

- PAN Europe complaint with the EU Court of Justice court is making progress;
- PAN Europe informed the general public about scientific finding and EU policy developments through our homepage: [savehoneybees.info](http://savehoneybees.info)
- PAN Europe was part of the collaboration on xylella fastidiosa, established between MEPs, farmers representatives and NGOs

### MEMBERS OF THE EUROPEAN PARLIAMENT ASKED A NUMBER OF QUESTIONS ABOUT PROTECTION OF BEES TO PUSH THE DEBATE FORWARD, INCLUDING:

- Question E-013348/2015 by Giulia Moi (EFDD) on Neonicotinoid threats to bees;
- Question E-012464/2015 by Miguel Viegas on the Impact of neonicotinoids on bees;
- Question E-012978-13/2015 by Pavel Poc (S&D), Bart Staes (Verts/ALE), Andrea Zanoni (ALDE), Bas Eickhout (Verts/ALE), Karin Kadenbach (S&D), Marisa Matias (GUE/NGL), Alojz Peterle (PPE) on Risk assessment of plant protection products on bees;
- Question E-013884/2015 by Marc Tarabella (S&D) on Bees and sulfoxaflor

POLICY

NATURE

AGRI-CULTURE

**IN 2013, THE PESTICIDE PROSULFOCARB (BOXER)**

*used by conventional cereal growers to combat weed was spread by evaporation and falling down with the rain ending up as pesticide residues in Danish organic apples, far from the fields, where the pesticide was used. Testresults from the Danish authorities shows, that the concentration of prosulfocarb in the atmosphere increases by several hundred percent during September and October.*

*The organic apple grower Poul Rytter Larsen from Harndrup Skov Frugtplantage in the island Fyn, was one of the persons whose apples were contaminated because of the drift.*

*Poul Rytter Larsen – Farmer Harndrup Skov Frugtplantage*

**IN SUMMER 2012 OUR NEIGHBOUR SPRAYED GLYPHOSATE (TAIFUN FORTE)**

*while it was windy. The pesticide cloud drifted into our garden. The resulting damage to hedges and garden plants could be seen days after – everything was brown. I suffered from health problems (sickness, attacks of sweating, stomach trouble) but recovered. Things were different for our dog, an Irish setter. He was severely poisoned and we had to witness him dying in agony. We didn't want to accept this and filed a suit – the legal proceedings are still pending.*

*Steffen Riedel – 57 years, retired policeman*



# ENDOCRINE DISRUPTING CHEMICALS

After the failure of the European Commission to present scientific criteria to identify EDCs by 2013, as it was requested in the Pesticide and Biocide Regulations, PAN Europe has been following closely the actions of DG SANTE, who is now in charge for the **regulatory** definition of EDCs.

In 2014 the Commission announced that it will carry out an Impact Assessment on the different options considered for the **regulatory** definition for EDCs and decision-making procedures. Out of these options only one reflects the state of the science on endocrine disruptors and reflects the rules of the Pesticide Regulation, which has introduced a **hazard** approach. That means that any pesticide that may be considered a hazard has to be banned. Our work in 2015 has ranged from scientific investigation on the effects of pesticides on the endocrine system of animals to policy advocacy to regulate EDCs using scientific criteria and protect the European population and the environment from undeliberate exposure to these chemicals.

PAN Europe did an impact assessment study (4 chapters) showing which of the pesticides that are currently on the market are endocrine disruptors. PAN Europe used all available data, both industry's dossiers and independent scientific literature and assessed which pesticides should be banned according to the Pesticide Regulation (chemicals with endocrine properties that may cause adverse effects) and which ones are likely to be banned according to the commission's options. The study includes a critique on the **biased** impact assessment of the industry claiming that banning EDCs in agriculture will cost billions, as well as a proposal on alternatives. The results of this work were also presented on the EDCs conference organised by DG SANTE on the 1st of June 2015.

PAN Europe decided to investigate what happened and why the scientific criteria to regulate EDCs never got approved, despite the hard work of DG Environment and the advisory groups of endocrinologists that took part. Following an access to document request PAN Europe found that DG SANTE, TTIP negotiations, industry lobbying and other industry-friendly Directories of the European Commission all played their role to block the production of science-based criteria to regulate endocrine disruptors and ask for an impact assessment. In the meantime, human and environmental health will continue to be impacted by these dangerous chemicals.

In the absence of correct criteria to identify EDCs, PAN Europe is following the work of DG SANTE and EFSA on whether the **interim** EDC criteria are applied and whether dangerous ED-pesticides are being re-approved. In 2015 no pesticide was banned for its endocrine disrupting properties, and the expiring date of most ED-pesticides was postponed.

Evidence and documents relating to PAN Europe's work on EDCs can be found at [pan-europe.info](http://pan-europe.info)

## PAN EUROPE'S ACTION ON ENDOCRINE DISRUPTING CHEMICALS

- A 4-chapter impact assessment study on endocrine disrupting pesticides, including a proposal of agricultural alternatives
- PAN Europe was invited to present its work on EDCs at the DG SANTE EDCs Conference on the 1st of June 2015
- A detailed timeline of the industry lobbying that blocked the Commission's decision on EDCs
- One critique of the guidance document on the development of **negligible exposure** by DG SANTE in relation to endocrine disrupting effects of pesticides to humans and non-target organisms
- PAN Europe communicated its concerns on **negligible exposure** to the European Commissioner Andriukaitis;
- One communication on EU decision making regarding the development of endocrine disrupting criterias
- One conference in the European Parliament on endocrine disruptors and future generations, where PAN Europe invited scientific effects from the field of endocrinology, as well as EU regulators to discuss the need to regulate **correctly** EDCs in Europe
- One communication on the work of EFSA to assess pesticides for their endocrine disrupting properties and possible adverse effects

POLICY

HUMAN HEALTH

**I WAS EXPOSED TO THE ORGANOPHOSPHATE PENTACHLOROPHENOL – PCP** when we first moved into our house in London. PCP is the same family of nasty chemicals as Agent Orange. The house had been sprayed with PCP against woodworm by the previous owners. The PCP had soaked into the carpet underlay and that had turned to dust so as I swept it up, I must have breathed it in. The previous owner had not been negligent, they had moved all their tenants out before spraying commenced.

Having previously been wrongly treated as asthma. Then I had a blood test through my doctor and the test found worrying amounts of Pentachlorophenol, and also Lindane, Dieldrin and DDT – these were probably from our previous flat that had been sprayed against cockroaches. I went on an organic diet, came off cows milk, generally cleaned up my act and I got better.

Then, ten years later I started to get flues and viruses again. I was diagnosed with Chronic Lymphatic Leukemia – CLL. I looked on the internet and found many cases in the USA where it had been proved in court that a causal link with exposure to Pentachlorophenol had caused CLL.

Molly Fletcher – London, England

I am a member of PAN Europe because I'm deeply concerned about the havoc to the land and to living creatures caused by industrialised, chemically-based agriculture.

Margaret Schooling – Retired Teacher  
Individual Member of PAN Europe

# FURTHER THREATS (GLYPHOSATE, etc.)

## GLYPHOSATE

PAN Europe has been deeply engaged and active the re-authorisation of glyphosate since the International Agency for Research on Cancer, an agency of the World Health Organisation, declared that Glyphosate, the most commonly used pesticide in the world, is **a probable carcinogen**.

The European Food Safety Administration (EFSA) quickly disagreed with those findings and the commission moved to reauthorize the use of Glyphosate for an additional 15 years. PAN Europe worked with local partner organisations to fight against this re-authorization through the publication of many letters, press statements, and lobbying tools including a petition signed by 135,733 citizens who wish to ban glyphosate in the EU.

The move to re-authorise of Glyphosate is ongoing and PAN-Europe is paying very close attention.

**Time is needed to assess both the endocrine potential of glyphosate and to reach a scientific consensus on the carcinogenicity and genotoxicity of this chemical.**

Europe needs to move towards a toxicity-free future and develop an agricultural system based on the use of non-toxic alternatives. Glyphosate can be replaced by mechanical weeding, precision farming and the use of less toxic substances like acetic acid (vinegar), phytotoxic oils (close) and salt-based herbicides.

Excerpt from Letter co-signed by PAN Europe to Commissioner Andriukaitison on Glyphosate: *As a matter of principle, EFSA scientific opinions, which form the basis of regulatory action, should be based on published scientific evidence. Restrictive access under the conditions of a physical reading room fails to fulfil this requirement. It has no place in an open scientific process. The aim must be that all EFSA assessments, not only on glyphosate, can be reproduced by any expert who wishes to do so.*

## EU DEBATE ON COMBINATION TOXICITY

Up to this point, combination toxicity has still not been calculated and citizens in Europe are not protected against this very serious risk--especially children and the unborn. We wish to change this as soon as possible and urge the Commission to implement the rules and force EU-institutes such as EFSA to stop delaying the implementation.

Regulation 396/2005/EC on maximum residue levels in or on food and feed of plant and animal origins specifies harmful effects of pesticide mixtures on health and the environment. Even though methods of assessment have been available for more than 10 years, EFSA continues to postpone taking actions on combination toxicity. Methods are analysed by EFSA and research programs to undermine the provision in the Regulation. As solid methods to assess combination toxicity have been available for many years, we will promote this fact as a significant input to the general debate on chemical mixtures.

We will focus our advocacy work on using a deterministic approach and the introduction of extra safety factors since current methodologies can only cover a small part (the known) of combination toxicity.

The full text of the letter this letter and more documents relating to PAN Europe's work on Glyphosate can be found at [pan-europe.info](http://pan-europe.info)

POLICY

HUMAN HEALTH

NATURE



*The only way to make sure that EU laws regulating the use of chemical products like pesticides and herbicides are being upheld, is to remain vigilant and to create a counter lobby. As a politician I therefore consider it as my task to work together closely with civil society, independent scientists, farmers and citizens to make sure European regulations are respected and properly implemented. Given the current toxic agricultural system and the short term profits for agro-chemical multinationals linked to that, we need to connect and work together. This is crucial for protecting the general interest, public health and biodiversity on the longer term. The knowledge and expertise of organisations like PAN are vital to be able to win battles ahead. The recent example of glyphosate shows we can come a long way and move Europe slowly but surely to a more sustainable food system.*

*Bart Staes – MEP, Belgium*

***I SUPPORT PAN EUROPE'S WORK*** because I believe that the toxic chemicals commonly used in conventional agriculture threaten the safety of our food, our soil, our health, and our planet.

*Christel Schaldemose – MEP, Denmark*

# COURT CASES

PAN Europe has a long history in bringing pesticide issues to the European Court of Justice. PAN Europe's best-known case is Case T-574/12 where we tested the Aarhus Conventions NGOs possibility of actually obtaining access to court. This court case, which started in 2008, ended in January 2015 where the final ruling of the Luxembourg court (Grand Chamber) decided not to give PAN Europe access to court and therefore despite several positive opinions earlier ended up agreeing with EU Commission, Council and Czech Republic who started an appeal to a previous decision of the General Court going against the international Aarhus convention.

In 2010, ClientEarth and Pesticide Action Network Europe (PAN Europe) applied for access to the European Food Safety Authority's (EFSA) working documents for a guidance document intended to provide an interpretation of EU regulations governing pesticide authorization applications. EFSA released the requested information except for the names of outside experts who commented on the draft guidance document. EFSA determined the names were personal data under European Commission Regulation 45/2001 and thus were exempt from disclosure. ClientEarth and PAN Europe's request to annul of EFSA's decision and in 2015 PAN Europe and ClientEarth won appeal in the EU Court of Justice (Case C-615/13 P).

In 2013 PAN Europe complained to the European Ombudsman (complaint 12/2013/MDC) on the practices of the European Commission regarding the authorisation and placing on the market of plant protection products (pesticides), challenging the Commission capacity to ensure that the active substances it approves are not harmful for human health, animal health, or the environment. In June 2015 the Ombudsman proposed a solution in this case to the Commission. As something very positive *the Ombudsman considered that the Commission, which has the duty to ensure that the active substances it approves are not harmful for human health, animal health, or the environment, may be too lenient in its practices and might not be taking sufficient account of the precautionary principle.*

Ombudsman therefore made several proposals aimed at improving the Commission's practices with a view to ensuring that human health, animal health and the environment are effectively protected in the EU, and requested the Commission to submit to her a report covering a number of specific points within two years of her decision.

Information relating to PAN Europe's court cases can be found at [pan-europe.info](http://pan-europe.info)

POLICY

**PLANT PROTECTION PRODUCTS** could also contribute to the (amphibian) decline, because amphibians use different habitats due to their complex life cycle and annual cycle. This means that they may come into contact with PPPs in food, water, land and air.

Aldrich et al. – May 2016

Amphibians and plant-protection products:  
what research and action is needed?  
Environmental Sciences Europe,

**BASED ON OUR RE-EVALUATION OF THE OVERALL COSTS** of pesticide use for the United States in Sect. 2.8.3, the benefit-cost ratio in this country (at the start of the 1990s) was 0.70. In 1992, Pimentel et al. concluded **complete long-term cost/benefit analysis of pesticide use would reduce the perceived profitability of pesticides.** The re-analysis of their data shows that the profitability of pesticides has, indeed, undoubtedly been overestimated in the past. Hence, pesticide use, at the doses applied, may have entailed costs exceeding the profits generated."

Bourguet & Guillemaud – 20 February 2016

The Hidden and External Costs of Pesticide Use.  
Sustainable Agriculture Reviews.

I am an individual member of PAN Europe because I believe that pesticides pose an existential threat to biodiversity across Europe. The exposure of humans and animals to pesticides is one of the most pressing challenges of our time. Being a PAN Europe member allows me to stay updated and active in the effort to reduce the harmful effects of pesticides.

Dr Nicolas J.Vereecken

Professor, Agroecology & Pollination Group  
Individual Member of PAN Europe

# VAT & PESTICIDE TAXATION

The thematic strategy on pesticides<sup>1</sup> says **taxation should be investigated further in order to establish a banded taxation system as a proxy for true externalities in the future.**

Recital 4 of the Sustainable Use Directive of Pesticides highlights that **Economic instruments can play a crucial role in the achievement of objectives relating to the sustainable use of pesticides. The use of such instruments at the appropriate level should therefore be encouraged while stressing that individual Member States can decide on their use without prejudice to the applicability of the State aid rules.**

Certain Member States within the European Union are still offering farmers a lower VAT level for the use of pesticides, see table below, despite their increased cost to public health and environment. Lower VAT rates for pesticides represent an environmentally harmful indirect subsidy.

The Scandinavian countries have a long tradition in the taxation of pesticides. In July 2013, Denmark introduced a pesticide tax, where taxation is not linked to the nominal value of the insecticides, but linked to their environmental and health toxicity. Also Norway has a pesticide tax, while Sweden argues that they prefer banning active substances rather than taxing them, an argument difficult to contradict.

## VAT LEVELS APPLIED IN THE MS FOR PESTICIDES & FERTILISERS<sup>2</sup>

MS	BE	BG	CZ	DK	DE	EE	EL	ES	FR	HR	IE	IT	CY	LV
PESTICIDES	12/21	20	21	25	19	20	13	10	10/20	25	23	22	5	21
FERTILISERS	12/21	20	21	25	19	20	13	10	10/20	25	0/23	4	5	21

MS	LT	LU	HU	MT	NL	AT	PL	PT	RO	SI	SK	FI	SE	UK
PESTICIDES	21	15	27	18	21	20	8	6	24	9,5	20	24	25	20
FERTILISERS	21	3	27	18	21	10/20	8	6	24	9,5	20	24	25	20

## A FEW OTHER ACTORS HAVE DECIDED TO EXPERIMENT WITH VARIOUS FORMS OF PESTICIDE TAXATION:

### GERMANY – SCHLESWIG-HOLSTEIN INITIATIVE TO INTRODUCE A RISK-BASED PESTICIDE TAX

Since 2001, domestic use of pesticides in Germany has increased by almost a third while the area of treatable land has remained largely unchanged. In addition, the 2015 targets for water protection are not being met.

PAN Europe members PAN Germany expressly welcome the initiative taken by Dr. Robert Habeck, the Minister of Agriculture for Schleswig-Holstein, to introduce a pesticide tax. The rationale behind the introduction of a risk-based tax on pesticides is that pesticides should not only be more expensive to account for the harm they cause to the environment, but that the tax should be levied in such a way that products which constitute a higher health risk are more heavily taxed. This would mean that



1 [http://ec.europa.eu/environment/ppps/pdf/pesticides\\_en.pdf](http://ec.europa.eu/environment/ppps/pdf/pesticides_en.pdf)

2 [http://ec.europa.eu/taxation\\_customs/resources/documents/taxation/vat/how\\_vat\\_works/rates/vat\\_rates\\_en.pdf](http://ec.europa.eu/taxation_customs/resources/documents/taxation/vat/how_vat_works/rates/vat_rates_en.pdf)

**I HAVE WORKED WITH PAN EUROPE ON SOME OF THE ISSUES INVOLVING FARMING AND THE ENVIRONMENT DEEMED CRUCIAL BOTH BY THE FARMERS AND THE WIDER PUBLIC**, including the neonicotinoids, the future of the pollinators or the robustness of the EU plant protection products regime. I have always appreciated the cooperation with PAN Europe experts and I am looking forward to continued work together in view of improving the sustainability of European farming.

Paul Brannen — MEP, UK

#### BENEFITS OF BECOMING A MEMBER OF PAN EUROPE

- Access to PAN Europe's Member listserv, an important resource for sharing information about current events, strategy, legislation, national actions, campaigns, reports, and European activities on Pesticides
- Invitations to member-only events such as:
  - » Capacity building workshops
  - » Webinars
  - » Trainings
  - » Seminars
- Voting power at the PAN Europe Annual General Assembly
- Continuous updates on the political developments at the EU level in relation to the regulation of pesticides in Europe and the promotion of alternatives
- Technical expertise and support for your local initiatives
- Links to members in other European nations to help collaborate and share best-practices
- Opportunity for joint fundraising and sponsorship with PAN Europe
- Access to Members-Only publications such as newsletters, policy documents, lobbying strategy documents, etc.
- Opportunity to represent PAN Europe at civil society dialogue meetings and groups

If you are interested in becoming a member,  
contact Timothy Eden, Partnership Manager – [tim@pan-europe.info](mailto:tim@pan-europe.info)



the least harmful products would become comparatively cheaper and thus more attractive and that harmful products would be replaced by less harmful alternatives. The tax revenue could then be used for specific purposes.

PAN Germany has been calling for the introduction of a pesticide tax in Germany for many years and hopes that the proposed concept will be further fleshed out and implemented to ensure that non-chemical methods of weed and pest control will be used more frequently and that pesticide producers and the biggest polluters, not the general public, bear the costs of pesticide use.

### THE DANISH PESTICIDE TAX

In 2013 the former Danish Government launched a campaign to reduce the pesticide load by 40% by 2015 from the 2011 load level. The plan has just been prolonged until the end of 2016. The main reasons for reducing pesticide use are to ensure a clean environment, good ecological conditions in nature, healthy food, better health and safety at work as well as more green workplaces. The goal is based on a new indicator, the Pesticide Load Indicator (PLI), as there is no target set for treatment frequency index (TFI) as earlier.

Where the TFI mainly reflects the intensity of pesticide use, the PLI is an indicator of the load on the environment and human health resulting from the actual use (sales) of pesticides. The main instrument is the pesticide tax, which in 2013 was increased and differentiated according to the load indicator. The pesticides causing the highest load will thus be the most expensive, and will encourage users of pesticides to comply with the integrated pest management - IPM principles (Art 14, annex III Dir. 128/2009), to use fewer pesticides and to use the pesticides causing lowest load.

The tax is differentiated according to indicators of relative health and environmental impacts of the different pesticides. Effective from July 1 2013, the law is differentiating the tax on approved pesticides; the tax is paid on pesticides according to how large the impacts from the pesticides are on health, nature, and groundwater.

### TAXATION OR RURAL DEVELOPMENT FUNDING?

Many Member States are offering rural development funding to farmers to encourage them to introduce crop-specific integrated pest management, and as a result reduce pesticide use. So while some MS are taking a stick approach towards pesticides use reductions (applying pesticide taxations) others are taking a carrot approach (offering more EU funding through rural development). PAN Europe has been discussing how to reduce pesticide-use through taxation.

PAN Europe – together with our members and other Brussels based NGOs – will work to end low VAT levels on pesticides. In some MS we will work for introduction of a pesticide tax, while in others working for development of solid rural development measures. This conversation helps come closer to reaching the objectives from the Communication of the Roadmap to a Resource Efficient Europe: to reduce resource inputs in food production by 20% by 2020 (page 18), and sets specific targets on introduction of environmental taxes (page 11).



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CELL, Luxembourg

Fundación Vivosano  
Madrid, Spain

National Movement  
of Friends of the Earth  
Sofia, Bulgaria

Foodwatch  
Amsterdam, Netherlands

SSNC  
Stockholm, Sweden

Danmarks  
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Copenhagen, Denmark

Milieudefensie  
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**TOURING EXHIBITION/CAMPAIGN  
FOR FURTHER EXPLANATIONS PLEASE DOWNLOAD THE BROCHURE:  
PAN-EUROPE.INFO/IPM-EXHIBITION-GUIDE**



INTEGRATED PEST MANAGEMENT | Working with nature



INTEGRATED PEST MANAGEMENT | Working with nature



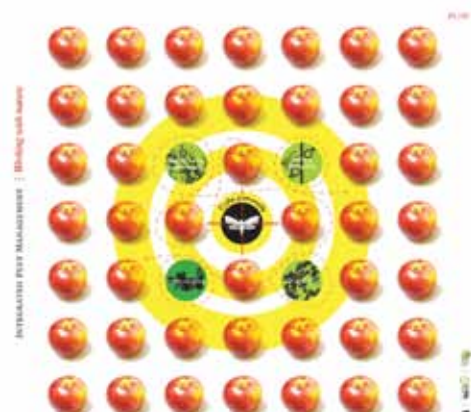
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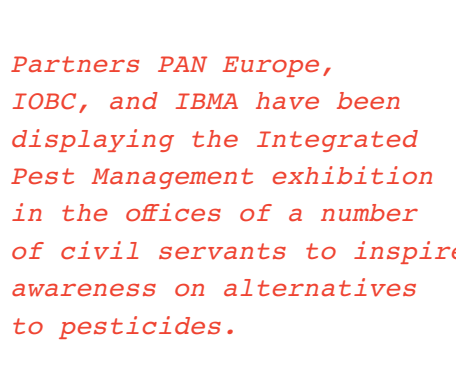
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INTEGRATED PEST MANAGEMENT | Working with nature

Partners PAN Europe, IOBC, and IBMA have been displaying the Integrated Pest Management exhibition in the offices of a number of civil servants to inspire awareness on alternatives to pesticides.

Expo / Working with Nature 1/11

Agronomic practices

Monitoring

Physical control

Biological control



CONFERENCE/CAMPAIGN/WEBSITE  
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