



PESTICIDE
FREE
TOWNS

ENDOCRINE
DISRUPTING
CHEMICALS

STOP
GLYPHOSATE

COURT
CASES

VOICES
OF
PESTICIDES

SAVE
THE
BEES

PAN
EUROPE'S
OUTREACH

SUSTAINABLE
USE
DIRECTIVE

PESTICIDE
TAXATION

POLITICAL
UPDATES ON
EU PESTICIDE
POLICY

INTEGRATED
PEST
MANAGEMENT

PESTICIDE ACTION NETWORK EUROPE
ANNUAL REVIEW 2018

"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 of The Silent Spring

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Reflecting on our work in 2018, it has been an incredible and challenging year. The key issues we have been working at PAN Europe have come under the spotlight both at national and EU level. The mounting scientific evidence keeps revealing the severe effects of pesticides on human health and the environment with insect Armageddon and the huge global biodiversity losses making headlines. In France, we have been particularly shocked and deeply saddened by the babies born with stunted or missing arms. Pesticides have been the most likely cause and common factor for these abnormalities.

At EU level, the issues of pesticide authorisation and use in Europe and the problems in the implementation of policies governing pesticides have been very high on the political agenda. As PAN, we have been in the frontline of civil society action on pesticides working on EU pesticide-related policies. We have strived to achieve a higher level of protection from pesticides and at the same



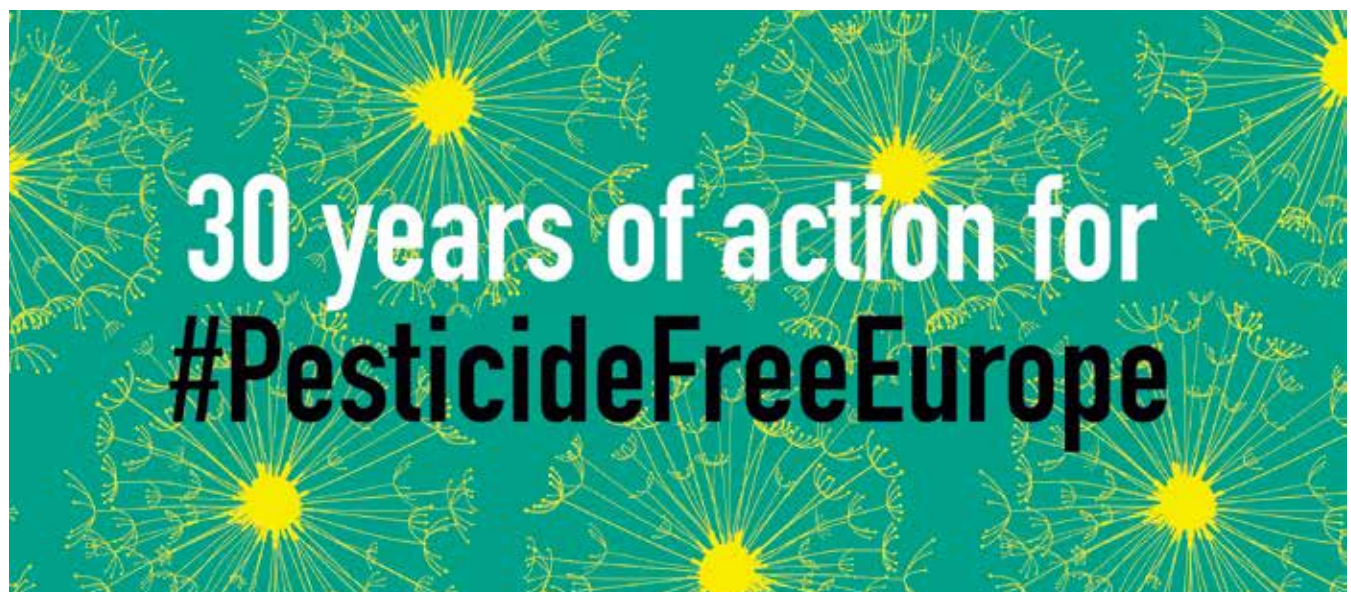
Francois Veillerette

time we showed that working with nature is the way forward. In our continuous fight, powerful citizens' mobilisations across Europe, together with the growing number of farmers breaking away from their dependency on chemical pesticides, give me hope that momentum is building for a real change.

The fight against pesticides is at a critical juncture. Business as usual is no longer an option and I hope that the upcoming European elections will bring an EU leadership which has as a first priority to protect the health of European Citizens and our environment and stands strong against pesticide industry's hard push to undermine the legislation and the science.

I also want to take this opportunity to thank you all, dedicated PAN Europe team, readers of this Annual Review, our members, partners, international PAN family, allies, and everyone who helps PAN Europe's work, for all your support.

TOGETHER FOR A PESTICIDE-FREE EUROPE!



We work to eliminate dependency on pesticides and support sustainable pest control methods

"Despite considerable progress in reducing the discharge of pollutants into Europe's waters in recent decades, nutrients, pesticides, industrial chemicals, and household chemicals continue to affect the quality of surface, ground and marine waters. This threatens aquatic ecosystems and raises concern about potential human health impacts."

European Environment Agency, State and
Outlook 2015 Safeguarding people from
environmental risks to health



**Pesticide
Action
Network**
Europe

A BRUSSELS BASED NGO

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. Network's projects and campaigns are coordinated by five autonomous regional Centres. PAN's vision is of a world in which 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.

PAN Europe is the regional centre in Europe. Located in Brussels, it was founded in 1987 and brings together 42 consumer, public health, and environmental organisations, trades unions, women's groups and farmer associations from across 27 European countries.

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.

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 citizen is 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. 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 and the contribution of pesticides to these effects is likely. 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 SALES IN THE EU

In 2016 almost 400,000 tonnes of pesticides were sold in Europe, with the vast majority used in the agricultural sector.



"Pesticides can persist in the environment for decades and pose a global threat to the entire ecological system upon which food production depends. Excessive use and misuse of pesticides result in contamination of surrounding soil and water sources, causing loss of biodiversity, destroying beneficial insect populations that act as natural enemies of pests and reducing the nutritional value of food."

**UN Report of the Special Rapporteur
on the right to food, 2017**



PESTICIDE USE ACROSS EUROPE KEEPS ON BEING HIGH WHICH IS NOT ONLY DANGEROUS BUT ALSO NOT SMART

In a Europe-wide study¹ in eight West and East European countries, researchers found important negative effects of agricultural intensification on wild plant, carabid and bird species diversity and on the potential for biological pest control, as estimated from the number of aphids taken by predators. Of the 13 components of intensification which was measured, use of insecticides and fungicides had consistent negative effects on biodiversity.

In France for instance, despite reduction plans have been in place since 2008, these reductions today still remain unfulfilled. But on the other hand, farmers could actually reduce their pesticide use by 30-40% without reducing their yield. Furthermore, a new study in France has showed that agroecology can feed Europe pesticide-free in 2050.²

The study from Geiger et al mentions a very important point: “insecticides also reduced the biological control potential”. Now it is time that farmers start managing rather than killing pests and applying integrated pest management which has been mandatory since January 2014 and which means that farmers should apply good agronomic practices, monitor the fields and if needed apply non chemicals alternatives, only applying pesticides as a last resort.

PAN EUROPE ACTIVITIES

- **INFORM CITIZENS AND POLICY MAKERS AND RAISE AWARENESS ON PESTICIDE PROBLEMS, REGULATIONS, AND NON-CHEMICAL ALTERNATIVES THROUGH REPORTS, FACT-SHEETS, POLICY BRIEFINGS, PRESS RELEASES, AND BLOG CONTRIBUTIONS AND SOCIAL MEDIA.**
- **INSPIRE CITIZENS' ACTIONS AND AMPLIFYING THE VOICES OF THOSE AFFECTED BY PESTICIDES**

- **INFLUENCE EU DECISION MAKING PROCESS BY INFORMING POLITICIANS ON THE UPDATES OF SCIENTIFIC RESEARCH ON THE ADVERSE EFFECTS OF PESTICIDES**
- **SHARING EVIDENCE AND PROPOSING REGULATORY CHANGES FOR A BETTER PROTECTION OF HUMAN HEALTH AND ENVIRONMENT FROM THE HARMS CAUSED BY PESTICIDES.**
- **ORGANISE WORKSHOPS, CONFERENCES, AND POLICY SEMINARS**
- **PROMOTE DIALOGUE FOR CHANGE AMONG GOVERNMENT, PRIVATE SECTOR AND CIVIL SOCIETY STAKEHOLDERS**

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 7TH ENVIRONMENT ACTION PROGRAMME (7TH EAP)**
 - > **THE EU HAS BEEN DEVELOPING AN EU STRATEGY ON NON-TOXIC ENVIRONMENT**
 - > **THE EU'S GREEN CAPITAL AWARD GIVES ATTENTION TO PESTICIDE USE IN TOWNS**

1- Geiger et al. 2010 “Persistent negative effects of pesticides on biodiversity and biological control potential on European farmland”

2- An agroecological Europe in 2050, IDDRI, September 2018

"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."

**Associate Prof. Nicolas J. Vereecken Chair of Agroecology
at the Université Libre de Bruxelles (ULB)
Individual Member of PAN Europe**

WHAT WE DO TO ENSURE RIGOROUS IMPLEMENTATION OF THE EU PESTICIDE REGULATIONS

PAN Europe is actively 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, and 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).

There are major concerns with regard to EU's pesticide policy and implementation of EU regulations. EU Directive 1107/2009 on authorisation of plant protection products and EU Directive 128/2009 on Sustainable Use of Pesticides, 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.

OMBUDSMAN'S DECISION

PAN Europe is not alone in worrying about this lack of implementation: PAN Europe has consulted the European Ombudsman (complaint 12/2013/MDC) about the EC's lacking implementation of EU Regulation 1107/2009. The verdict came out in June 2015. 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. In February 2016, The EU Ombudsman ordered DG SANTE to change their practices and apply the law strictly. According to PAN Europe assessments, 91% of the pesticide approvals, DG Sante keeps authorising a pesticide despite of data gaps and incomplete risk assessment.

Documents and reports supporting our work on the above regulations can be found at PAN-Europe.info

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 In 2018 with Constantin Muraru and Michela Bilotta

"Food and farming have always been central to our existence, but over the past few decades, we nearly surrendered our right to ensure that agricultural production is as safe as possible for humans and our environment. No factor threatens the safety of our food and our environment more than synthetic pesticides—substances the industry ironically calls "crop protection." In documenting the story of the "pesticide-free town" of Mals in the Italian Alps, I found both the staff and the written materials of PAN-EU to be critical resources for my book research. Even as an American, I am a supporting member of PAN-EU and am reliant upon their cutting-edge research and policy initiatives. As an international leader in pesticide reform, PAN-EU's work provides me with information and policy approaches that can be utilized in the United States and beyond."

**Philip Ackerman-Leist, Professor of Sustainable
Agriculture & Food Systems and Author of
*A Precautionary Tale: How One Small Town Banned Pesticides,
Preserved Its Food Heritage, and Inspired a Movement***

While the Commission is reviewing the effectiveness of the Pesticide and Maximum residue limits Regulations under the REFIT evaluation, the issue of pesticide authorisation and use in Europe and the problems in the implementation of EU policies -PAN Europe's main working areas- have been in the spotlight of the European Parliament.

Following the glyphosate "scandal" in February 2018, the European Parliamentary Research Service published a briefing on the authorisation of pesticides in the EU, with a focus on glyphosate, highlighting the problems revealed in the process. At the same time, the European Parliament decided to set up a Special Committee "on the Union's authorisation procedure for pesticides (PEST Committee)" addressing the growing concerns expressed by Citizens. After 9 months of investigation, the Committee adopted a report, containing factual findings and recommendations as to measures to be taken to improve human, animal and environmental health protection from pesticides, in line with the EU law.

On 16th of January 2019 the European Parliament adopted this resolution, capturing several of PAN Europe's demands:

- To improve the quality, expertise, independence and transparency in safety assessment of pesticide active ingredients, co-formulants and pesticide products; focus on long-term toxicity and neurotoxicity from low doses; make all assessment studies publicly available; never approve dossiers with data gaps
- To implement a strong conflict of interest policy in the whole process and to set up an EFSA committee to investigate the independence and expertise of all European experts involved in the procedure.
- A post-market vigilant system of pesticide exposure, taking into account real-life exposures as well as a full implementation of the sustainable use of pesticides directive giving priority to sustainable and ecological alternatives.
- To ban the use of pesticides in areas used by the general public or vulnerable groups (schools, hospitals) as well as for crop desiccation that speeds up cereals' maturation

Similarly, in September 2018, the European Parliament adopted the ENVI Committee resolution on the implementation of the Plant Protection Products Regulation (EC) No 1107/2009, which concludes and recommends, among others, the need to:

- Apply the precautionary principle as preventive-decision making and pay particular attention to the protection of vulnerable groups

- To implement strictly the cut-off criteria, including EDCs and substances that are toxic to bees, and stop the extension of authorisation of such active substances
- Put an end in the misuse of derogations such as Article 53(2) emergency authorisation (e.g. for neonicotinoids), amendment of negligible exposure to negligible risk.
- Invest to promote implementation and research on IPM and use of low-risk substances, including non-chemical alternatives to pesticides

Regarding the progress in implementation of the SUD, the European Commission should -according to the SUD- had published an implementation report in 2014. This, however, was published in 2017 (COM(2017) 587 final). The EU Council on Agriculture (on 6 November 2017) and the European Parliament (on 13 November 2017) have both discussed the report and both confirmed their engagement towards ensuring serious implementation in the future. The European Parliament decided to follow up on this implementation by preparing an own initiative report. MEP Jytte Guteland was nominated as rapporteur. She made a first draft over the summer which was presented and discussed in the Autumn 2018 while the final report was approved in plenary in 2019. The final report (TA(2019)0082) adopted on 12 February 2019 highlighted the many problems associated with pesticide use and dependency and criticizing Member States for their lack of implementation of the Directive, in particular their weak and inconsistent National Action Plans, and their lack of commitment to IPM, with calls on MS to include clear quantitative targets as well as clearly defined annual reduction targets in their NAPs. The report also called on the Commission and the Member States to no longer allow the use of pesticides in areas used by the general public or vulnerable groups.

In Spring 2018, the European Parliament adopted an own initiative report on the future of food and farming recalling the link between pesticide use and degradation of biodiversity while calling for a specific measure within rural development – centred around the European Union's eight principles of Integrated Pest Management (IPM) – in order to encourage a reduction in the use of serious pesticides and promote the uptake of non-chemical alternatives.



WHAT WE EXPECT FROM THE EU INSTITUTIONS

EUROPEAN PARLIAMENT

- REFORM OF THE CAP, TAKING THE WORK FORWARD BASED ON ENVIRONMENT COMMITTEE VOTE - GIVING IT A CLEAR PESTICIDE REDUCTION ANGLE, HIGHLIGHTING THE SUD INTO ALL ASPECTS OF THE CAP
- FOLLOW THE DEVELOPMENT IN THE SUD IMPLEMENTATION AND CONSIDER MAKING A NEW OWN INITIATIVE REPORT IN 2019 TO FOLLOW THE NEXT EVALUATION, THIS TIME PROPOSING LEGISLATIVE CHANGES TO THE SUD INTRODUCING QUANTITATIVE USE TARGETS AND CLEAR TIMETABLE TO ENSURE IMPLEMENTATION
- PROTECT THE HAZARD-BASED APPROACH OF THE PESTICIDE REGULATION AND THE IMPLEMENTATION OF PRECAUTIONARY PRINCIPLE, ALSO RELEVANT TO THE PESTICIDE REFIT PROCESS.

EUROPEAN COMMISSION

- REVISE THE SUD INTRODUCING QUANTITATIVE USE REDUCTIONS, TIME TABLES AND MEASURES FOLLOWING THE RECOMMENDATIONS OF THE EP REPORT, AS ORIGINALLY FORESEEN IN THE THEMATIC STRATEGY ON PESTICIDES, WHILE MAKING IT MANDATORY FOR FARMERS TO ANNUALLY SENT PESTICIDE USE DATA TO COMPETENT AUTHORITIES
- PROTECT THE HAZARD-BASED APPROACH OF THE PESTICIDE REGULATION AND IMPLEMENT THE PRECAUTIONARY PRINCIPLE IN PESTICIDE DECISIONS.
- GIVE PRIORITY TO HUMAN HEALTH AND THE ENVIRONMENT IN THE FITNESS CHECK REVISION OF THE EUROPEAN POLICIES ON ENDOCRINE DISRUPTORS
- UPDATE GUIDANCE DOCUMENTS AND ENFORCE MONITORING AND MITIGATION MEASURES IN MEMBER STATES TO SIGNIFICANTLY IMPROVE PROTECTION OF HUMAN HEALTH AND BIODIVERSITY FROM PESTICIDE USE.
- CONTINUE TO PUBLISH ANNUAL SALE OF ACTIVE SUBSTANCE, BUT GIVING MORE DETAILS ON ACTIVE SUBSTANCES WHILE PUBLISHING USE DATA AS FORESEEN IN EU REGULATION 1185/2009 ON PESTICIDE STATISTICS
- STOP GIVING DEROGATION ALLOWING MEMBER STATES TO USE NON-AUTHORIZED PESTICIDES, AND ENSURE THE PESTICIDE REGULATION PACKAGE TO FINALLY BE IMPLEMENTED

EUROPEAN COUNCIL (MEMBER STATES)

- START SERIOUSLY IMPLEMENT THE SUD, STOP GRANTING DEROGATIONS ON BANNED PESTICIDES
- START PUBLISHING PESTICIDE USE TRENDS (AS FORESEEN IN ARTICLE 15 OF THE SUD)
- STAND BY THE CIVIL SOCIETY AND PROTECT THE PRECAUTIONARY PRINCIPLE AND HAZARD-BASED APPROACH OF THE PESTICIDE REGULATION TO PRIORITISE HUMAN HEALTH AND THE ENVIRONMENT.

In the Autumn 2018, the European Parliament started to discuss the reform of the EU's Common Agricultural policy (CAP). Three legislative proposals were made, one on financial aspects, one on sectoral, and one on the CAP strategic plan. The Environment Committee obtained a co-decision on certain aspects of the CAP strategic plan, and adopted in early 2019 an opinion emphasising the best alternatives to using pesticides: good agronomic practices, among others calling for a reinforcement of the conditionality for farmers to obtain full CAP direct payments.

While the Parliament's Environment and Public Health Committee agreed on a opinion proposing opening up several instruments allowing farmers to finally start applying Integrated Pest Management as foreseen in the EU's Directive on Sustainable Use of Pesticides and allowing member states to set objectives for pesticide use reduction in their CAP plans, the result from the Agriculture Committee was depressing, as it was only reinforcing a few impact indicators meant to measure progress. It will be for the new Members of the European Parliament to take this debate future.

European Parliament's Environment Committee was also active on protecting pollinators. A motion for a resolution was adapted in November on the European initiative for pollinators presented by the European Commission in June 2018. The motion for a resolution supported the initiative for pollinators, presented by the European Commission in June to address the decline of pollinators in the EU however underlined that the Initiative fails to sufficiently address the main root causes of pollinators' decline, which include intensive agricultural management practices and pesticides among others. It also stressed that an indicator related to pollinator diversity and abundance should be developed within the CAP in order to evaluate its performance in this area.

THE EUROPEAN COMMISSION

Following a request from the College of Commissioners, led by Commissioner Andriukaitis, the European Commission's Scientific Advice Mechanism (SAM) Group of Chief Scientific Advisors delivered in 2018 a Scientific Opinion

on "Authorisation processes of Plant Protection Products in Europe from a scientific point of view". The opinion successfully identified some shortfalls, for example that post-market monitoring of pesticides is missing to ensure that the adequate protection requested by EU law is provided, that the health risk from mixtures of Pesticide Product and long-term exposure is not adequately assessed and that there is a lack of expertise and transparency in the decision-making process.

In June 2018, the European Commission adopted a Communication on the first-ever EU initiative on pollinators in order to address the decline of pollinators in the EU.

In October 2018, the study supporting the Commission's REFIT Evaluation of the EU legislation on plant protection products and pesticides residues (Regulation (EC) No 1107/2009 and Regulation (EC) No 396/2005) was finalised and published. The report recognises the value of the two pieces of regulation to protect human and environmental health and addresses some obstacles in the implementation. Some of the obstacles that have been identified are: the increased use of emergency authorisation, the authorisation timelines which are exceeded, the fact that mixtures are still not regulated and the lack of substitution of substances with hazardous properties.

NEW LEGISLATION

Following the Citizens' concerns, and responding to the second demand of the glyphosate ECI to reform the pesticide authorisation process, the European Commission proposed in April 2018, a revision of the General Food Law, and presented a transparency proposal aiming at increasing transparency and expertise in EU risk assessment procedure, also relevant to pesticides. After trialogue negotiations among the European Institutions, and the support of the European Citizens, the proposal was adopted in February 2019. This is an enormous success as it calls for all industry studies used in regulatory risk assessment to be made public, including the raw data, and increase independence and expertise of experts involved in the process.

"I have had the honour to be Rapporteur for the Parliament's implementation report on the Sustainable Use of Pesticides Directive. The SUPD is a central piece of legislation to enable a more sustainable agricultural model in Europe, with better protection for citizens' health and our ecosystems. Regrettably, it is clear that many Member States fail to implement these rules. This is not acceptable. I expect that my work and the clear message from the parliament will lead to swift and concrete improvements by Member States. I appreciate Pan Europe's great expertise in this field and value PAN's important role in encouraging Member States to implement the directive."

Jytte Guteland, MEP, Sweden

2. A reminder



Monitoring EU SUD compliance in Sweden, Denmark, Poland, Germany, Italy and the Netherlands:
PAN's suggestions for better future auditing and implementation



Pesticide Action Network Europe

the Directive of Pesticides, which aims to ensure the more widespread use of land management techniques such as crop rotation the Commission will support the Member States in the development of methodologies to assess compliance with the eight IPM principles, taking into account the diversity of EU agriculture and the principle of subsidiarity".



Monitoring, Physical control, Biological control

PAN Europe started in 2002 a campaign on pesticide use reductions called PURE, which resulted in the EU Directive on Sustainable Use of Pesticides (SUD) adopted by the EU in 2009.

The SUD provides a good policy framework to ensure a serious move towards society which is less dependent on pesticides. It calls for uptake of low impact management in both farming and public areas, even encouraging banning pesticides in public areas, with the purpose of reducing dependency on the use of pesticides).

ACCORDING TO EU DIRECTIVE ON SUSTAINABLE USE OF PESTICIDES SHALL MEMBER STATES:

- **SET UP QUANTITATIVE OBJECTIVES, TARGETS, MEASURES AND TIMETABLES TO REDUCE PESTICIDES USE' BY DEVELOPING NATIONAL ACTION PLANS**
- **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**

As part of the SUD, Member States needed to develop so-called National Action Plans (NAPs) explaining how they were going to ensure implementation of the SUD, by answering among others on how to fulfil above requirements. Unfortunately, these NAPs suggest little or limited ambition.

The European Commission – who is the watchdog of the EU laws – has finally published its long-awaited report on the implementation of the SUD in October 2017 (with a three-year delay) to be sent to the European Parliament and the European Council. PAN Europe has published a reaction report in November 2017 calling that it is now time to take serious action to recover the time lost.

The evaluation report from the European Commission clearly shows that one of the big hurdle in the implementation of the SUDP is the move towards IPM.

The Commission report was presented and discussed in both the European Council and the European Parliament. The European Council welcomed the report and its finding and promised to engage further with the SUD implementation in the future, and as part of that, among others, discussing establishment of harmonised risk indicators to finally start measuring compliance of the SUD. PAN Europe, together with PAN Germany and PAN UK, has published its position on the EC proposal for the establishment of Harmonised Risk Indicators with concrete proposals for establishing indicators which can both monitor use and drive policy for reducing pesticide dependence throughout the EU.

There have been Commission fact-finding missions in 2017 in the Netherlands, Denmark and Germany, Italy, Sweden, Poland to evaluate the implementation of the SUD. PAN Europe has published its report with recommendations for better future auditing and implementation.

A new Commission report evaluating the revised NAPs is expected to be published in the end of 2019. Article 4 of the SUD does clearly specify that the European Commission could accompany this report by legislative proposals for improvements.

Member States were meant to revise their NAPs in 2017. PAN Europe, together with its members, has sent open letters to national Ministers regarding the NAPs revisions urging to publish revised National Action Plans (NAPs), as foreseen in the SUD in 2017-early 2018, this time identifying overall objectives, quantitative targets, timetables and measures on pesticide dependency reductions, giving special attention to improving water quality and the uptake of alternative techniques in the agricultural sector.

However, it is not only Member States that need to take actions, the European Commission also needs to change its focus. So far, the European Commission is focusing on SUDP, moving away from the unclear objectives of 'reduce risk and impacts' towards quantifiable objectives of reducing pesticide dependency.

The SUD is a visionary directive. From the viewpoint of biodiversity and water protection its implementation is every bit as important as the EU biodiversity strategy and the water framework directive. Rachel Carson would be proud of its ambition! Without implementation, the stubbornly high use of PPPs will continue and the recovery of biodiversity and water quality be impossible. The directive does not advocate the exclusion of PPPs but sets a clear road whereby they are products of last rather than first resort, a reason in itself to continue with the symposia with the clear aim of farming via the IPM triangle.

Michael Hamell, Chairman of the Annual IPM Symposium

The EU Directive on Sustainable Use of Pesticides (SUD) states that Member States shall take all necessary measures to promote low pesticide-input pest management (including integrated pest management-IPM) giving wherever possible priority to 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.

However, IPM will not be seriously taken up by farmer across Europe if its principles are not fully included into the EU Common Agricultural Policy (CAP). PAN Europe and its members encourage one serious long term objective of the CAP: development and maintenance of low impact farming systems.

On 1 June 2018, the EU Commission presented its proposal for the CAP reform post 2020, promoting the idea of shifting policy from compliance to performance, shifting the CAP into a so-called "New Delivery Model", with broad policy objectives and common performance indicators. Since then, the Commission proposal has been discussed in the

European Council and the European Parliament. As CAP has been promoted as a result-based policy, PAN Europe has been calling for a CAP which support farmers in their transition to low impact farming systems with the farm subsidies funding the uptake of serious integrated pest management as actually explained in the EU's directive on sustainable use of pesticides, including targeting also agroecological and organic production techniques, assisting to reduce farmers' dependency on pesticides, and encouraging them to work with nature not against it.

PAN EUROPE'S ACTIONS ON AGRICULTURE

PAN Europe advocates for pesticide dependency reductions, encouraging policy changes towards ensuring that farmers apply integrated pest management based on solid agronomic practices to prevent pest build-up and on the use of non-chemical alternatives. Farmers should apply pesticides only where absolutely needed and carefully select pesticides with the lowest harm.

Since 2012 PAN Europe has been annually organising joint symposiums in Brussels together with scientists united in International Organisation on Biological Control (IOBC) and companies producing alternatives to pesticides united in International Biocontrol Manufacturer Association (IBMA) in order to illustrate that IPM is a viable alternative to chemically-based agriculture.



4.2 Introduction of robust output indicators on pesticide use reductions

is the legislative proposals, pesticide use is neither mentioned in the indicators linked to biodiversity (e.g. pollinators) nor in the indicators linked to water. Sustainable pesticide use is only mentioned as an indicator within 'Societal demands on food and health, including safe, nutritious and sustainable food' (2.2). The result indicator (3.37) for Sustainable use of agricultural land (concerned by supporters) led to a sustainable use of pesticides in order to protect pollinators without specifying what the same time, the 'output indicator' is missing.

an output indicator on pesticide dependency to measure compliance with article 14 of the IPR (IPM triangle), linking this to the a specific measure within rural development

ative proposals regarding CAP beyond 2020 peer Commission in June 2018¹², the European aims to integrate the following pesticide-related

is 007/2006 of the European Parliament and of the Council of 21 January 2006 concerning the placing of plant protection products on the market and second sentence:

products shall be a valid property. Where necessary, it shall be possible for the competent authorities to require the holder of the authorisation to take such measures as may be necessary to ensure compliance with the conditions of use of the product, in accordance with Article 28 and without prejudice to any other measures.

price of that same article is not included.
 apply with the provisions of Directive 2006/116/EC, and, in particular, with
 one of proposed part management, is referred to in Article 34 of and
 in that Directive, which shall apply, at the latest on 1 January 2004.

BEC of the European Parliament and of the Council of 21 October 1993 (framework for Community action to achieve the sustainable use of OJ 24.11.2009, p. 75).

gird to restrictions on the use of pesticides in protected areas defined in Water Framework Directive and Natura 2000 legislation.

and therefore, the following two conditions are necessary for the model to hold:



In 2018, 6th Annual IPM Symposium on “Sustainable Use of Pesticides Directive - Integrated Pest Management in Arable Crops” was organised at the European Parliament, hosted by the MEP Pavel Poc, the Vice-Chair of the Environment Committee. Its focus was on the development of IPM in arable farming with a strong emphasis on soil, farmers’ experiences and the political dimension of fully implementing the directive. You can find the presentations on our website.

PAN Europe has a touring exhibition **IPM – working with nature** with 11 posters and an accompanying booklet explaining what IPM working with nature means in specific crops, and how the EU Directive of Sustainable Use of Pesticides can be implemented and fully integrated into the EU Common Agricultural Policy. This touring exhibition has so far been shown at various venues across Europe, including European Institutions in Brussels. The brochure “IPM – working with nature” has continued to be distributed in English and French.

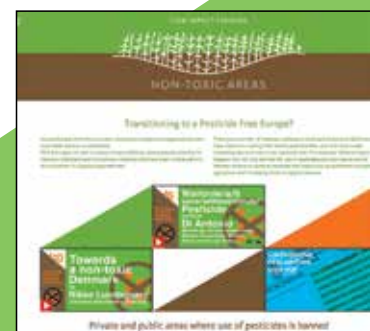
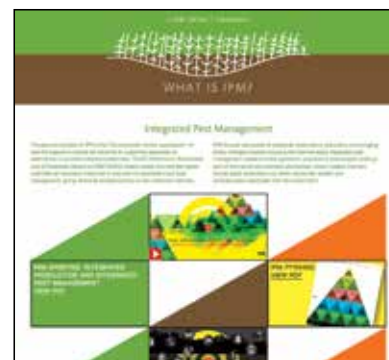
If you wish to host the exhibition contact henriette@pan-europe.info

Building on the IPM exhibition “Working with Nature”, PAN Europe has put together short technical videos presenting the main posters, as well as testimonies of farmers (in arable crops as well as apple and grape production) on their experience with IPM. You can watch the movies on our campaign website: Low-impact-farming.info PAN Europe has also been organising farms visits showing IPM uptake in different sectors.

PAN Europe continues working on the Common Agricultural Policy, aiming at integrating the SUDP fully into the CAP, and as part of that making serious pesticide use reductions one of the success indicators PAN Europe position paper of October 2018 PAN Europe has put forward concrete proposals on how to make the CAP to deliver on reducing EU’s dependency on pesticides while encouraging the much-needed agroecological transition.

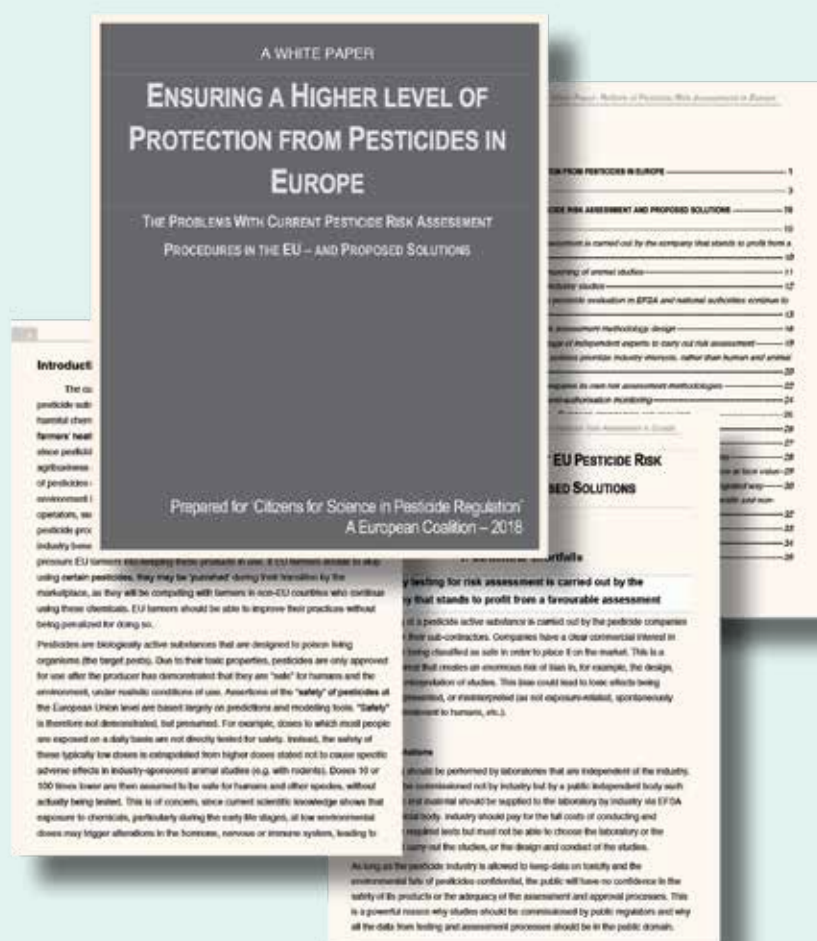
HIGHLIGHTS IN 2018

- **6TH ANNUAL SYMPOSIUM ON SUSTAINABLE USE OF PESTICIDES DIRECTIVE - INTEGRATED PEST MANAGEMENT IN ARABLE CROPS WAS ORGANISED AT THE EUROPEAN PARLIAMENT. LOCAL PARALLEL DEBATED ON IPM WERE ORGANISED IN SWEDEN, PORTUGAL, SWITZERLAND AND GERMANY**
- **POSITION PAPER FOR A NEW DELIVERY MODEL FOR THE CAP AFTER 2020**
- **OPEN LETTERS TO NATIONAL AGRICULTURE MINISTERS CALLING ON THE SERIOUS IMPLEMENTATION OF SUD AND REVISION OF NAPS TO ENSURE THE SERIOUS UPTAKE OF IPM IN THE AGRICULTURAL SECTOR**
- **OPEN LETTERS TO EU PRESIDENCIES AND EC AGRICULTURE COMMISSIONER ON THE NEW CAP REFORM CALLING FOR ACTIONS TO REDUCE PESTICIDE DEPENDENCY**
- **IPM EXHIBITION WORKING ON NATURE EXPOSED IN VENUES ACROSS EUROPE**
- **WE STARTED TO BUILD AN IPM TOOLBOX TO INSPIRE FARM ADVISORY SERVICES ACROSS EUROPE**
- **FILMS SHOWCASING IPM IN PRACTICE**



“There is clear evidence that organophosphate pesticide exposure during pregnancy is linked to increased risk of neurodevelopmental disorders and IQ loss. Pesticide authorisation reform is urgently needed”

**Barbara Demeneix, Professeur
Muséum National d'Histoire Naturelle, France**



A EUROPEAN COALITION “CITIZENS FOR SCIENCE IN PESTICIDE REGULATION”

The European Union has one of the best regulations for pesticides in the world – in theory. But it is not implemented in practice. PAN launched in 2018 a big campaign on risk assessment reform together with a new European Coalition “Citizens for Science in Pesticide Regulation”. The current pesticide risk assessment procedure that determines the approval of pesticide substances in European Union ends up authorising the use of harmful chemicals in the production of our food and management of public green areas, putting at risk the health of European Citizens and our environment.

The coalition’s manifesto for “rigorous science, safe food, and a healthy environment”, has been signed by more than 110 civil society organisations and institutions, as well as individual experts, and has called upon European regulators to urgently reform the current pesticide risk assessment and risk management system and suggested practical solutions to the major failings in the system. If the EU pesticide regulation were properly implemented and risk assessment methods were overhauled to be scientifically rigorous and objective, a number of pesticides that were previously deemed safe would be shown to endanger human health and/or the environment and would have to be banned or restricted.

The manifesto and the coalition launch came at the crucial moment when the European Commission has been reviewing pesticides legislation as part of its REFIT programme, the European Parliament published a series of reports and set up the PEST Committee to investigate the European Union’s authorisation procedure for pesticides, and the Commission and presented a proposal to increase transparency in European food law.

The proposal was a big success calling to publish all industry safety studies and putting an end to their secrecy; however it only addresses partly the ECI demands and several of the EU citizens’ concerns remain to be addressed.

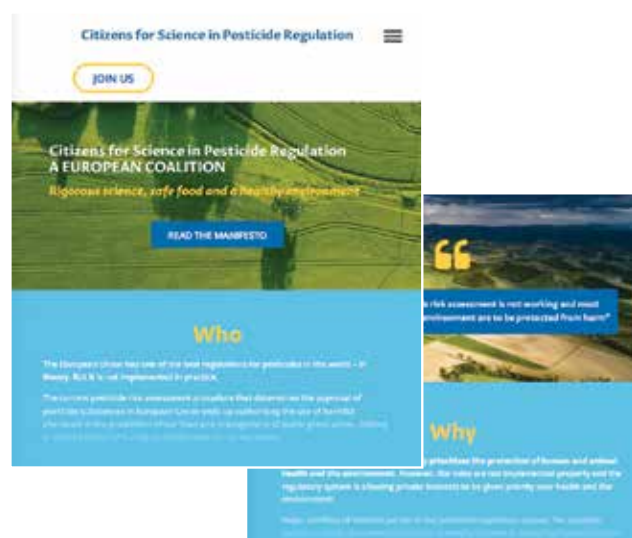
STOP GLYPHOSATE!

Glyphosate is one of Europe’s most widely used pesticides, and its negative impacts on the environment and biodiversity are clearly documented. Expanding scientific evidence demonstrates that glyphosate is also a serious threat to human health, in 2015, the International Agency for Research on Cancer (IARC) of the World Health Organisation (WHO) classified glyphosate as “probably carcinogenic to humans”. IARC has found sufficient evidence in laboratory animals, and limited evidence in humans, that glyphosate can cause cancer.

The EU has controversially and scandalously renewed glyphosate authorisation in 2017 for another 5 years - the original proposal was a 15-year renewal - with an unrestricted licence despite the EU Parliament’s call for a phase-out and public outcry.

The public and political awareness around glyphosate was compounded by the sheer speed at which the #StopGlyphosate European Citizens’ Initiative (ECI) fulfilled the requirements to be officially deemed successful: having reached a million signatures in 7 member states only six months from its launch - it was the fastest-growing ECI ever! With ECI #StopGlyphosate, PAN Europe - together with other civil society organisations - demanded to ban glyphosate (and reform the pesticides approval procedure and protect citizens and the environment from exposure to hazardous pesticides).

...



"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. Their expertise has been a great help in my work in the Special Committee that has investigated the authorisation procedure of pesticides. 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."

**Bart Staes, MEP for Flanders/Belgium,
co-rapporteur for the PEST Committee on the
EU pesticide authorisation procedure**

... In responding to ECI #StopGlyphosate and growing public outcry and concerns over safety and transparency of glyphosate risk assessment, the Commission published a legislative proposal aiming at increased transparency, accountability and sustainability of the risk assessment process in the food chain transparency and risk assessment process under the General Food Law in April 2018.

Following the exposure of misconducts in the assessment of glyphosate in Europe and the ECI calling to ban glyphosate and reform the risk assessment procedure, the European Parliament set up a Special Committee in 2018 to investigate the authorisation procedure for pesticides (PEST committee). After 8 months of investigations, hearings, missions, as well as the commissioning of studies, the Committee reported end of 2018 that the current system is failing to achieve its purpose, highlighting the need for urgent change.

In the meanwhile, on the other side of the Atlantic in a landmark cancer trial in California, the court ordered Monsanto to pay glyphosate victim - Dewayne Lee Johnson - \$78 million based on findings that his use of Monsanto's herbicides caused his non-Hodgkin lymphoma and Monsanto covered up the risks. Monsanto (Bayer) is currently facing roughly 11,000 plaintiffs all alleging that exposure to Monsanto's Roundup herbicide and its active ingredient, glyphosate, cause non-Hodgkin lymphoma (NHL).

PAN EUROPE'S ACTIONS ON GLYPHOSATE

PAN Europe has been campaigning and taking actions against the re-authorisation of glyphosate in Europe since the International Agency for Research on Cancer, an agency of the World Health Organisation declared that Glyphosate, the most used herbicide in the world, is "a probable carcinogen." PAN Europe has been working with partner organisations to fight against the re-authorization of glyphosate through the publication of many open letters, press statements, and information materials, and sharing newly emerging scientific evidence.

Following up on the successful European Citizens Initiative #StopGlyphosate, PAN Europe launched a new citizens coalition "Citizens for Science in Pesticide Regulation" bringing together civil society organisations, institutions, scientists and individual experts calling upon European regulators to urgently reform the current pesticide risk assessment and risk management system, and suggests practical solutions to the major failings.

Working also on non-chemical alternatives to glyphosate, in July 2018, PAN Europe published its revised report on "alternative methods in weed management to the use of glyphosate and other herbicides", as a contribution to the ongoing discussions among some Member States, led by France, on phasing out glyphosate and promoting alternatives.

HIGHLIGHTS IN 2018

- REVISED REPORT ON "ALTERNATIVE METHODS TO GLYPHOSATE AND OTHER HERBICIDES IN WEED MANAGEMENT"
- LAUNCHING A WHITE PAPER TO ENSURE A HIGHER LEVEL OF PROTECTION FROM PESTICIDES IN EUROPE
- LAUNCHING A NEW CAMPAIGN WITH THE NEW EUROPEAN COALITION CITIZENS FOR SCIENCE IN PESTICIDE REGULATION AND A MANIFESTO



"Ending the use of pesticides in public areas and private gardens is just common sense. Since the ban of pesticide use in all non-agricultural areas in France, the law has been implemented without problems. In fact, 80% of the population supports the pesticide ban. I very much appreciate working with PAN Europe for a full European ban on the non-agricultural use of pesticides."

Joel Labbé, French Senator, author of the law banning pesticides in public areas and in private gardens



"As local authorities we need the support of the EU to implement bans on pesticides in order to protect biodiversity and health of our citizens. In Mals, we have set off on a journey to become a pesticide free town, we held a referendum and vast majority of people here stated that they wanted to live in a town without pesticides. We have had a lot of hurdles and removed a lot obstacles on our journey in order to implement the pesticide ban."

Ulrich Veith, Mayor of Mals, South Tyrol, Italy

Pesticides are not only used in agriculture but also in the towns and cities. They are used in green areas of schools, playgrounds, kindergartens, parks, private gardens, sport fields, sidewalks and cemeteries. While 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.

There is no need for the use of pesticides in towns. This has been repeatedly proven by the many towns and cities that are already pesticide free. 70 per cent of European citizens live in cities and citizens are increasingly concerned about the use of pesticides and there is a strong political and public interest to ban use of pesticides in public areas. Whereas many towns and cities in Europe are already pesticide-free as a part of a national regulation (e.g. France, Belgium and Luxemburg), there is a growing number of cities and towns across Europe who are individually working towards going pesticide-free, or interested in doing so. Going pesticide free not only helps to protect the people and environment of cities and towns but is also fundamental in transition to a truly green city.

PAN EUROPE'S ACTIONS ON PESTICIDE-FREE TOWNS

Since 2015, PAN Europe has been running a campaign on Pesticide Free Towns with a dedicated

website in 8 languages. More and more member states and municipalities around Europe are taking actions to ban the use of pesticides in public areas including cemeteries, sidewalks, parks, schools, kindergartens, sport fields, railways, just to name a few. Towns making the effort to become pesticide-free represents a significant step in reducing our dangerous exposure to pesticides.

PAN Europe has continued spreading knowledge and good practices from across Europe on pesticide free management of green public spaces and together with its members, continued inspiring and encouraging towns and cities to become pesticide free towards a joined the European Network of Pesticide Free Towns (Pesticide-free-towns.info/towns-network) The network has continued expanding welcoming more committed cities and towns in Italy, Portugal, Estonia and Croatia.

PAN Europe has been also campaigning for a ban on the use of pesticides in non-agricultural areas (both public and private). In a conference organised in June 2018 at the European Economic and Social Committee, PAN Europe convened citizens networks, EU Institutions, Member States representatives and local politicians to discuss existing local actions and as well as enabling policy and regulatory frameworks for cities and towns to ban pesticide use in the areas under their control in order to protect biodiversity and citizens' health.



"There is no doubt that the EU needs to increase its efforts to phase out harmful substances from our daily lives, we all deserve to live in a non-toxic environment. As an MEP, I have been working to set European citizens free from pesticides in urban areas and PAN Europe has been a valuable partner in this. PAN Europe's role has been crucial in encouraging and the EU Institutions and member states to adopt a total ban of synthetic pesticides in urban areas."

Nicola Caputo, MEP, Italy



Another influential event was “Pesticide Free Towns: European policies, local strategies and future perspectives” organised in September 2018 at the European Parliament convening mayors from European Network on pesticide-free towns, Members of the European Parliament, European Commission DG Sante, Member States’ politicians and cities networks to discuss European and local strategies for making European towns pesticide-free. The highlight of the meeting was the signing of a joint declaration by mayors and MEPs which called on EU Institutions and member states for a total ban of pesticides in public areas. Following the event, organizing MEPs together with the rapporteur for the implementing report on SUP Directive Jytte Guteland, made a joint press release calling the European Commission to set ban pesticide use in public areas and that the EU should invest more in networking best practices at European level.

HIGHLIGHTS IN 2018

- A CONFERENCE ORGANISED AT EUROPEAN ECONOMIC AND SOCIAL COMMITTEE: INSPIRING CITIZEN-DRIVEN ACTIONS FOR NATURE-BASED CITIES, JUNE 2018
- AN EVENT AT THE EUROPEAN PARLIAMENT ON “PESTICIDE FREE TOWNS: EUROPEAN POLICIES, LOCAL STRATEGIES AND FUTURE PERSPECTIVES” SEPTEMBER 2018
- POSITION PAPER “ENACTING A EUROPE-WIDE FULL BAN ON NON-AGRICULTURAL USE OF PESTICIDES” SEPTEMBER 2018
- THE PESTICIDE FREE TOWN CAMPAIGN WEBSITE WAS TRANSLATED TO SPANISH IS AVAILABLE NOW IN EIGHT LANGUAGES: PESTICIDE-FREE-TOWNS.INFO
- A EUROPEAN NETWORK OF PESTICIDE FREE TOWNS AND A MAP OF COMMITTED TOWNS
- MAP OF PIONEER PESTICIDE FREE TOWNS IN BELGIUM, DENMARK, FRANCE AND THE NETHERLANDS
- RAISING AWARENESS ON THE ISSUE OF INTENSIVE PESTICIDE USE IN UNESCO WORLD HERITAGE AND PROTECTION OF BIODIVERSITY IN THE WORLD HERITAGE SITES

POLICY CHANGES AS A RESULT OF PAN EUROPE’S WORK

- THE EU GREEN CAPITAL AWARDS RECOGNISE THAT BEING PESTICIDE-FREE IS ALSO A TOPIC OF ENVIRONMENTAL IMPORTANCE
- THE CALL TO BAN PESTICIDES IN PUBLIC AREAS WAS TAKEN UP BOTH IN THE FINAL REPORTS OF THE PEST COMMITTEE AND ENVIRONMENT COMMITTEE’S REPORT ON THE IMPLEMENTATION OF THE SUD



"Since 1989, in 63 nature reserves in Germany the total biomass of flying insects has decreased by more than 75 percent. This decrease has long been suspected but has turned out to be more severe than previously thought. The fact that the number of flying insects is decreasing at such a high rate in such a large area is an alarming discovery. What we must do right now is maintain the utmost caution and take immediate action. We need to do less of the things that we know have a negative impact, such as the use of pesticides and do more of the things that are profitable for insects, such as reinstall farmland borders full of flowers."

**Dr. Hans de Kroon, Professor, Radboud University,
Co-author of the Publication *More than 75 percent decline
over 27 years in total flying insect biomass in
protected areas*, 2017**



Since their approval at EU-level in the 90's, neonicotinoids have been largely proven to harm honey bees, other pollinators and the environment as a whole. Several studies also indicate toxicity on human health.

After years of battle from beekeepers and environmental NGOs -including PAN Europe, the European Commission restricted the use of 3 highly bee-toxic neonicotinoids in 2013. Imidacloprid, clothianidin and thiamethoxam were then banned on bee-attractive crops. Evidence further showed that even application of neonicotinoids on non-bee-attractive crops led to exposure of bees as these substances are highly persistent in the environment which was also repeated by a series of EFSA reports.

Based on EFSA's conclusions confirming the high risk posed by these substances on bees and that no safe use existed, Member States finally voted in 27 April 2018 banning all outdoor uses of the 3 bee-killing neonicotinoids.

Bees continue being under threat despite the EU ban on three highly bee-toxic neonicotinoids. A loophole in the Pesticides Regulation continues unlawfully allowing 'emergency authorisations' through which the national authorities may temporarily allow unauthorised pesticides to be used in the European Union. In fact, according to the Article 53 of the Regulation, 'emergency authorisations' for banned or non-approved pesticides can only be used in 'exceptional circumstances', for example, when a danger to crops or the environment leaves the farmer or Member State with no other choice other than to use the pesticide. However, this mechanism is continuously being abused by EU Member States. According to PAN's analysis and other publications, there has been an inconceivable increase in the number of "emergencies" throughout Europe over the last years.

PAN EUROPE'S ACTIONS TO SAVE THE BEES

PAN Europe has been campaigning to obtain a full ban on neonicotinoids and to stop the emergency authorisations for banned or non-approved pesticides granted by EU Member States.

PAN Europe has gathered its members and allies to mobilize across Europe to put pressure on our decision makers in order to obtain a full ban on neonicotinoids. A Save The Bees Coalition was launched and coordinated by PAN Europe putting pressure on national governments who were dragging their feet to support the Commission's proposal for a full ban. Save the Bees Coalition has very quickly gathered more than 120 NGOs across the EU to achieve an EU ban on neonicotinoids and a better protection of pollinators against pesticides in general.

PAN Europe has been supporting European Commission's ban on neonicotinoids before the European Court of Justice and the battle to save the bees and other pollinators has been planned to be pursued before the national courts. PAN Europe, together with its members, has been acting to initiate a number of court cases against the unlawful "emergency authorisations".

PAN Europe has supported and contributed to the development of European Commission's Pollinators Initiative, adapted in June 2018, to address the decline of pollinators in the EU and contribute to global conservation efforts.

PAN Europe is a stakeholder in the EU Bee Partnership on data sharing - an initiative hosted by the European Food Safety Authority aiming to better understand the drivers of bees' decline through increased data sharing among stakeholders. As a stakeholder at different platforms and initiatives, PAN Europe has been the NGO Watchdog on regulatory efforts aiming to save the bees and other pollinators.

HIGHLIGHTS IN 2018

- **SAVE THE BEES COALITION MOBILIZING EUROPEAN AND NATIONAL NGOS FOR A FULL BAN ON NEONICOTINOID PESTICIDES: WWW.BEECOALITION.EU**
- **INFORMING EU REGULATORS, STAKEHOLDERS AND GENERAL PUBLIC ABOUT SCIENTIFIC FINDINGS AND EU POLICY DEVELOPMENTS THROUGH REGULAR PRESS RELEASES, OPEN LETTERS, POLICY BRIEFINGS AND SOCIAL MEDIA**
- **ACTIONS AGAINST UNLAWFUL EMERGENCY AUTHORISATIONS**

"I lived in the countryside for 70 years. I'm therefore not frightened by the slightly muddy roads or rugged terrain. However, for some time I have been fighting two cancers. The municipality of Fernelmont, where I reside, is surrounded by agricultural land and inundated by the spraying of pesticides. In addition to my own, I noticed an abnormally high case of cancers in my neighborhood: 20 of which 8 in the same street. For the past eight months, I have been carrying out various actions to challenge local authorities and the population on this subject so that preventive measures are put in place such as buffer zones. The local and regional authorities are launching investigations but have not been taking into account the actual figures for cancers and other pathologies."

Marie-Thérèse Gillet, Citizen, Belgium

Pesticides that are endocrine disruptors (EDs or EDCs for Endocrine Disrupting Chemicals) are currently being sprayed on European fields and public green areas and may be the cause of a wide range of endocrine-related diseases that have been observed in farmers, their children, residents, bystanders and consumers. They also contribute to the environmental and ecosystem degradation we witness today.

2018 was a milestone in the regulation of pesticides and biocides with endocrine disrupting properties as both the scientific criteria and the guidance document on their implementation were put into force.

The criteria to regulate biocides and pesticides with endocrine disrupting properties were put into force in July and November 2018.

In November 2018, just few days before the EDC criteria were put into force, the European Commission published a communication “Towards a comprehensive European Union framework on endocrine disruptors” aiming to confirm its commitment to protect citizens and the environment from hazardous chemicals, however without calling to ban a single such chemical. “This is an empty document” stated PAN Europe as it fails to take any immediate action to protect human and the environment from harm caused by these chemicals, many of them pesticides.

In line with the 7th Environmental Protection Programme, an updated Union Strategy on endocrine disruptors was expected with specific goals to phase out the use of ED chemicals (EDCs) as soon as possible and promote non-toxic

alternatives. Instead, in 2018, the Commission launched a plan to do a fitness check on the various ED policies before any action is taken.

A fitness check at this moment, not only has delayed further taking any drastic measure to start eliminating EDCs from our daily lives, but it has been also totally premature since the EU policies on EDCs have hardly been implemented.

PAN EUROPE’S ACTIONS ON EDCs

In 2018, being a stakeholder of the ad-hoc ECHA/EFSA Endocrine Disruption Consultation Group, PAN Europe carried out an evaluation on the guidance document on the implementation of the criteria for endocrine disrupting pesticides and biocides -developed by EFSA/ECHA/JRC together with Member States. This was achieved through close collaboration with PAN Europe’s NGO and scientific networks (Endocrine society, coalition EDC free Europe, PAN Europe network), and meetings with Member State experts.

PAN Europe has been following the developments of the Community Strategy for Endocrine Disruptors which was adopted twenty years ago aiming to set preventive decision making and ensure a higher level of environmental protection.

In 2018, PAN has worked intensively on recently established criteria for identifying endocrine disruptors and as well as on making of the guidance document on their implementation.

PAN Europe carried out a scientific analysis on the implementation of the current criteria to identify pesticides with endocrine disrupting properties,



"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

updated its internal database and selected a few examples of pesticides that fulfil the interim criteria or are endocrine disruptors but have been authorised in the past 2-3 years. The conclusion is that DG SANTE managed to avoid using the interim criteria and just postponed decisions for the pesticides being subject to the interim criteria. Results were presented at European Parliament's complementary meeting on Pesticides in September 2018.

Together with the EDC free coalition, PAN Europe has also closely followed Commission's strategy publication, gave its expert feedback to public consultations on Commission's roadmap stressing the need to set clear rules to stop citizens' and environmental exposure to pesticides that are endocrine chemicals. PAN Europe expressed publicly its disappointment with the lack of commitment in the final Commission's Communication to take significant measures to reduce EDC exposure.

Based on its research on ED pesticides PAN Europe selected chlorpyrifos, a neurotoxic pesticide exposure to which is related to learning deficiencies in children, to make it a symbol and raise public awareness on the harm that ED pesticides may cause. PAN Europe, together with its NGO partners, created an expert group called "ban chlorpyrifos" and prepared a fact sheet on chlorpyrifos. PAN Europe also worked together with SumOfUs to launch a petition that has been signed by over 170,000 Europeans.

PAN Europe did a scientific literature review to create a database on ED pesticides (EDPs) in EU freshwater ecosystems, and produced a summary table on the adverse effects on key non-target organisms. Using the database, PAN Europe wrote a report together with Spanish NGO Ecologistas en Accion on EDPs in Spanish waters.

HIGHLIGHTS IN 2018

- **CREATING A DATABASE ON ED PESTICIDES IN EUROPEAN WATERS AND CO-PUBLISHING A REPORT ON EDCs IN SPANISH RIVERS**
- **FEEDBACK ON COMMISSION'S ROADMAP: "TOWARDS**

A MORE COMPREHENSIVE EU FRAMEWORK ON ENDOCRINE DISRUPTORS"

- **SCIENTIFIC ANALYSIS ON THE IMPLEMENTATION OF THE CURRENT CRITERIA TO IDENTIFY PESTICIDES WITH ENDOCRINE DISRUPTING PROPERTIES**
- **REGULAR PRESS RELEASES, POLICY BRIEFINGS AND FACTSHEETS**
- **SENDING OPEN LETTERS OF OUR CONCERNS TO HEALTH COMMISSIONER ANDRIUKAITIS AND COMMISSION PRESIDENT JUNKER ON THE EDC CRITERIA PROPOSAL AND ON THE COMMUNITY STRATEGY FOR ENDOCRINE DISRUPTORS**
- **OPEN LETTERS TO THE MEMBER STATES' REPRESENTATIVES, MEMBERS OF THE EUROPEAN PARLIAMENT, THE EUROPEAN COMMISSION AND EU MINISTERS**

EU DEBATE ON COMBINATION TOXICITY

Up to this point, combination toxicity has still not been addressed 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 European food and feed of plant and animal origins aims to prevent harmful effects of pesticide mixtures on human health. Pesticide Regulation 1107/2009 also aims to protect humans, animals and the environment against pesticide mixtures. Even though methods of assessment proposals have been available for more than 10 years, EFSA and the Commission continue to postpone taking actions on combination toxicity. In addition, EFSA analyses and research programmes undermine the provision in the Regulations. We will promote the implementation of available methods to determine combination into the general debate on chemical mixtures.

PAN Europe has been focusing its 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.

"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



PAN Europe has a long history in bringing 'pesticide issues' to the European Court of Justice.

In February 2016, following a case filed by PAN Europe in 2013 to the European Ombudsman (complaint 12/2013/MDC), Ombudsman published its decision accusing Commission's Health Directory DG SANTE for "maladministration" one of the reason being giving authorization to pesticide active substances while important safety data are missing known as "confirmatory data procedure". Another reason was the lack of important data related to environmental safety.

PAN Europe won a legal case at the European Court of Justice (Case T-51/15) against the EU Commission (DG Trade) in September 2016, for refusing to provide access to documents with information on endocrine disrupting chemicals (EDCs). The Luxembourg court rejected EU Commission's overused argument of "an ongoing policy" to deny the right for the public to access documents of Community institutions and bodies. According to the Court, these are "general, vague and imprecise claims" and miss the overall objective of the Reg. 1367/2006 to create "an even closer union among the peoples of Europe, in which decisions are taken as openly as possible and as closely as possible to the citizens".

PAN Europe and Greenpeace Nederland finally won the case In November 2016 against the European Commission (C-673/13 P, in appeal), which had started in 2011, for refusing to provide the documents related to the assessment of glyphosate (toxicity testing of the active ingredient and the formulas of the tested products). The European Court of Justice confirmed that this is "information which relates to emissions into the environment" and should be provided by the Commission. According to the EU's access to documents laws, public authorities, including the EU institutions, cannot disclose information that would harm the

commercial interests of a third party unless there is an overriding public interest in doing so. According to the court's decision if the information relates to emissions into the environment, there is an irrebuttable presumption that disclosure is in the public interest.

In 2018, PAN Europe continued the court cases on access to documents to DG SANTE and SG in relation to endocrine disruptors. Commission ignored the successful 2016 verdict that only allowed non-disclosure in very specific and argument-supported cases. In 2018, we turn our attention to the national level. We started a court case on the pesticide Captan and started two others (cumulative toxicity, candidate of substitution) in 2018.

CONFLICT OF INTEREST IN RISK ASSESMENT OF PESTICIDES

European risk assessment of chemicals and decision-making has to be based on current scientific and technical knowledge. This rule has to be respected particularly during the implementation of the European Union (EU) Regulations by the European Commission in the final decision taking, such as is the case of the approval of pesticides. The best available science should be used to protect EU citizens and the environment against the harm that chemicals may cause. This is what the European law mandates and what people expect from regulators, and therefore this is what the EU Commission should deliver. Nevertheless, for several risk assessment methodologies, the criteria and (test) methods that are the basis for decision-taking, it has been demonstrated that science can be twisted and turned. Industry lobby organisation, as well as industry-linked experts have managed to impose their ideas of risk assessment on European risk assessment on food, as revealed in PAN Europe's report on "Industry Writing Its Own Rules" published in February 2018.

"My name is Gianluigi Salvador and I live in Refrontolo, in the Province of Treviso, Italy. When I moved there, the ecosystem in Refrontolo was still mostly uncultivated and there were only a few farmers in the area. Gradually, the prosecco's trade, the most famous local wine, exploded and the demand increased. The entire area was transformed into a monoculture of vineyards for the production of prosecco. My home and my orchard were constantly contaminated because of the drift of neighbours' pesticides. My family is forced to remain home when we hear the spray nozzle and we cannot enjoy our garden for five months of the year. I wanted to start cultivating vegetables in my small hectare but it is no longer possible. Conventional Prosecco vineyards - and the pesticides that they apply - are everywhere and the paradise that welcomed me and my family to the area became just a memory."

Gianluigi Salvador, Italy

VAT AND PESTICIDE TAXATION

The 2006 EU thematic strategy on the sustainable use of pesticides says “taxation should be investigated further in order to establish a ‘banded’ taxation system as a proxy for true externalities in the future”.

The recital 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, despite their increased cost to public health and environment. Lower VAT rates for pesticides represent an environmentally harmful indirect subsidy.

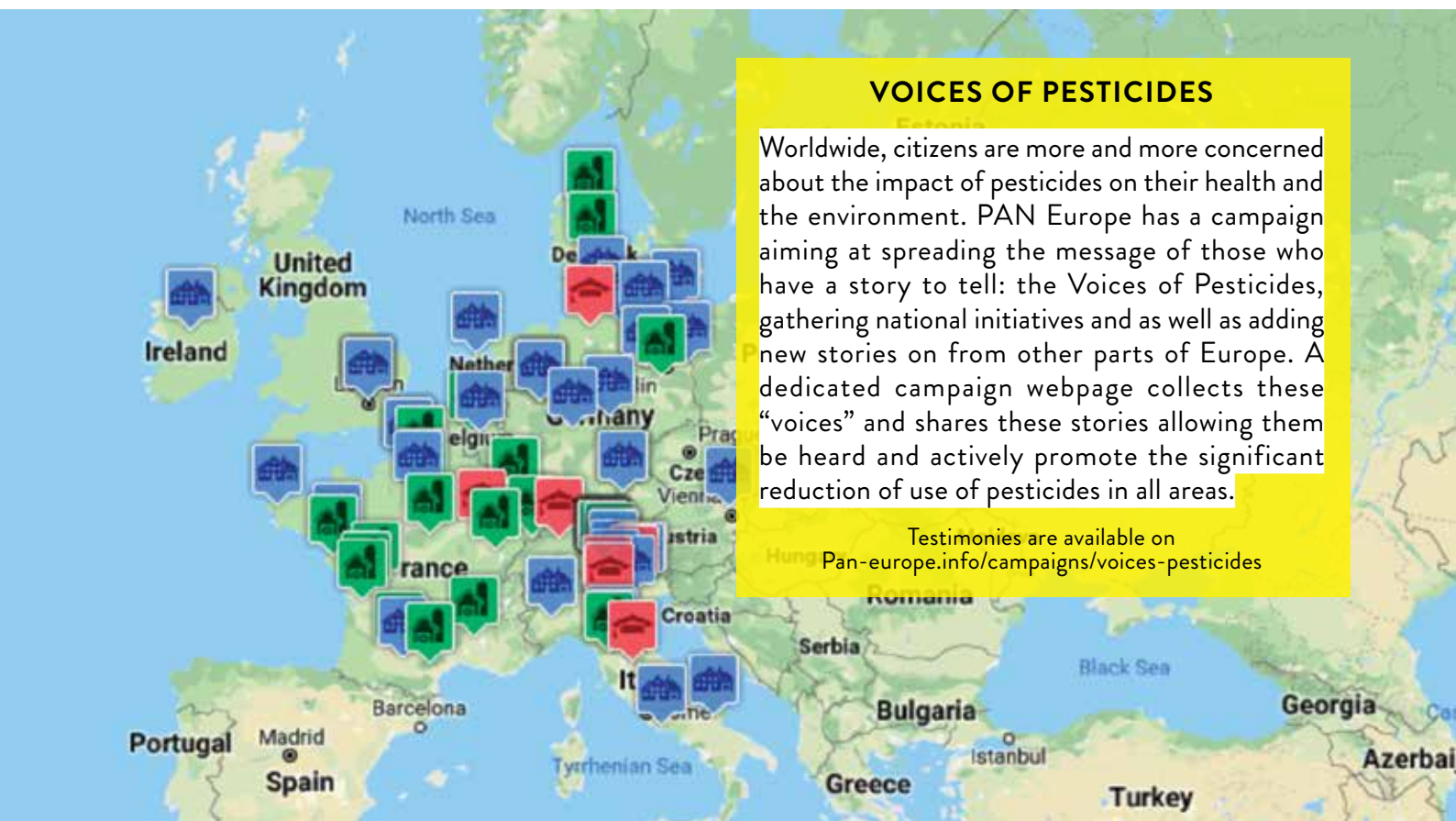
PAN Europe has a database on best practice in pesticide taxation, providing an overview of different taxation schemes.

See Pan-europe.info/issues/pesticide-taxation

PAN EUROPE’S OUTREACH

IN 2018, WE FURTHER IMPROVED OUR OUTREACH AND FURTHER DEVELOPED OUR COMMUNICATION TOOLS AND VISUAL MATERIALS

- WE REGULARLY UPDATED WEBSITE PAN-EUROPE.INFO
- WE INCREASED THE NUMBER OF NEWSLETTER SUBSCRIBERS TO 4000
- WE INCREASED THE NUMBER OF FACEBOOK “LIKES” TO 3700 AND A RATING OF 4,9 OUT OF 5 POSSIBLE STARS
- WE INCREASED THE NUMBER OF FOLLOWERS ON TWITTER TO 2250 FOLLOWERS @EUROPEPAN
- WE SENT OUT 37 PRESS RELEASES AND WERE QUOTED MORE THAN 80 TIMES BY BOTH LOCAL AND EUROPEAN PRESS INCLUDING THE GUARDIAN, LE MONDE, POLITICO AND ENDSEUROPE
- 4 SEASONAL NEWSLETTERS INCLUDING A SPECIAL EDITION ON PESTICIDE ACTION WEEK
- 5 DEDICATED CAMPAIGN WEBSITES: PESTICIDE-FREE-TOWNS.INFO | LOW-IMPACT-FARMING.INFO | BEECOALITION.EU | DISRUPTINGFOOD.INFO | EDC-EU-TOUR.INFO
- INCREASED VISIBILITY AND KNOWLEDGE OF PAN EUROPE WORK TOPICS AMONG GENERAL PUBLIC VIA INTERACTIVE DAILY POSTS ON SOCIAL MEDIA
- SUPPORTED AND PROMOTED PESTICIDE ACTION WEEK WHILE INSPIRING CITIZENS’ NETWORKS FOR MOBILISATIONS



VOICES OF PESTICIDES

Worldwide, citizens are more and more concerned about the impact of pesticides on their health and the environment. PAN Europe has a campaign aiming at spreading the message of those who have a story to tell: the Voices of Pesticides, gathering national initiatives and as well as adding new stories on from other parts of Europe. A dedicated campaign webpage collects these “voices” and shares these stories allowing them to be heard and actively promote the significant reduction of use of pesticides in all areas.

Testimonies are available on Pan-europe.info/campaigns/voices-pesticides

"Polden-Puckham Charitable Foundation are pleased to fund PAN Europe's essential work - it is clear that a wholesale change towards low impact methods of farming is needed and PAN Europe is facilitating that change through educating policy-makers on viable alternatives to damaging pesticides."

Christine Oliver,
Polden-Puckham Charitable Foundation



An annual grassroots initiative for
awareness-raising and action for
a pesticide free Europe

HOW IS PAN EUROPE FINANCED

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ORGANISATIONAL DEVELOPMENT WITH AND FOR OUR MEMBERS

PAN Europe continuously develops strategies, identifies ways and undertakes actions to strengthen the organisational structure to allow PAN Europe to show its effectiveness externally, increase visibility, and improve members' engagement.

PAN Europe brings together a diversity of European organisations working to replace the use of hazardous pesticides. We place real emphasis on supporting our members and working to foster greater cooperation among the network.

Our network unites 42 member organisations.

In 2018, we further expanded our network welcoming new members from Switzerland, Spain, and Croatia.

PAN EUROPE MEMBERS

EDEN Environmental Center | AL

AWHHE | AM

AEGU | AT

Global 2000 | AT

Adalia | BE

ClientEarth | BE UK PL

Inter-Environnement Wallonie | BE

Nature et Progres Belgium | BE

Velt | BE

Foundation for Environment and Agriculture | BG

National Movement of Friends of the Earth | BG

Eco Hvar | HR

Earth Trek | HR

Danmarks Naturfredningsforening | DK

Eco Council | DK

Estonian Green Movement | EE

FANC | FI

Generations Futures | FR

PAN Germany | DE

Ecocity | GR

VOICE | IE

PAN Italy | IT

Accademia delle Erbe Spontanee | IT

Centre for Ecological Learning Luxembourg | LU

Ecodesign Competence Centre | LV

Milieudefensie | NL

WECF | NL

PKE | PL

Spoleczny Instytut Ekologiczny | PL

Quercus | PT

Adept | RO

Earth Thrive | CS UK

ITR | SI

CEPTA | SK

Ecologistas en Acción - Spain

Fundación Alborado - Spain

Fundación Vivosano - Spain

SSNC - Sweden

Public Eye | CH

ToxicFree Suisse | CH

Bugday Association for Ecological Living | TR

Center of sustainable Development and

Ecological education Dovkilla | UA

PAN UK | UK

KEEP UP-TO-DATE WITH OUR ISSUES & CAMPAIGNS:
FB-PAN EUROPE TWITTER-@EUROPEPAN INSTAGRAM-PAN.EUROPE
YOUTUBE-PANEUROPEINFO YOU TUBE CHANNEL
NEWSLETTER-SIGN UP AT PAN-EUROPE.INFO

BECOME A PAN-EUROPE MEMBER:
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PAN-EUROPE IS A REGISTERED NON-PROFIT ORGANISATION:
PAN-EUROPE.INFO/SUPPORT-US

PAN-EUROPE.INFO



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**Pesticide
Action
Network**
Europe