

“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 & Author of Silent Spring

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Relecting on our work in 2019, it has been an incredible and challenging year. The key issues we have been working at PAN Europe have come under the spotlight at national, EU and even world level. 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 regular headlines.

In France, we have been dealing with pesticide issues both at home and abroad. While it was incredibly inspiring to see the growing movement of French Mayors fighting to ban pesticides in their municipalities, we were also particularly shocked and deeply saddened by the news that Guadeloupe and Martinique, French islands in the Caribbean were found to be massively contaminated by chlordecone, a pesticide similar to DDT which has been linked to cancer. This is even more scandalous since these islands, as “overseas departments” of the French state, are technically part of the European Union, where chlordecone is banned due to health and environmental concerns.

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 was evident upon the accession of the new European Commission and publication of its flagship Green Deal.

As PAN, we have been on the frontline of civil society action, working on EU pesticide-related policies. We have strived to achieve a higher level of protection from pesticides and at the same time we showed that working with nature is the way forward. In our continuous fight, powerful citizens' mobilisations across Europe, along with the growing number of farmers breaking away 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 outcome of this year's European elections will result in an EU leadership which has as its top priority the protection of its Citizens' health and of the environment, and stands strong against the pesticide industry's attempts to undermine strict legislation and sound 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.

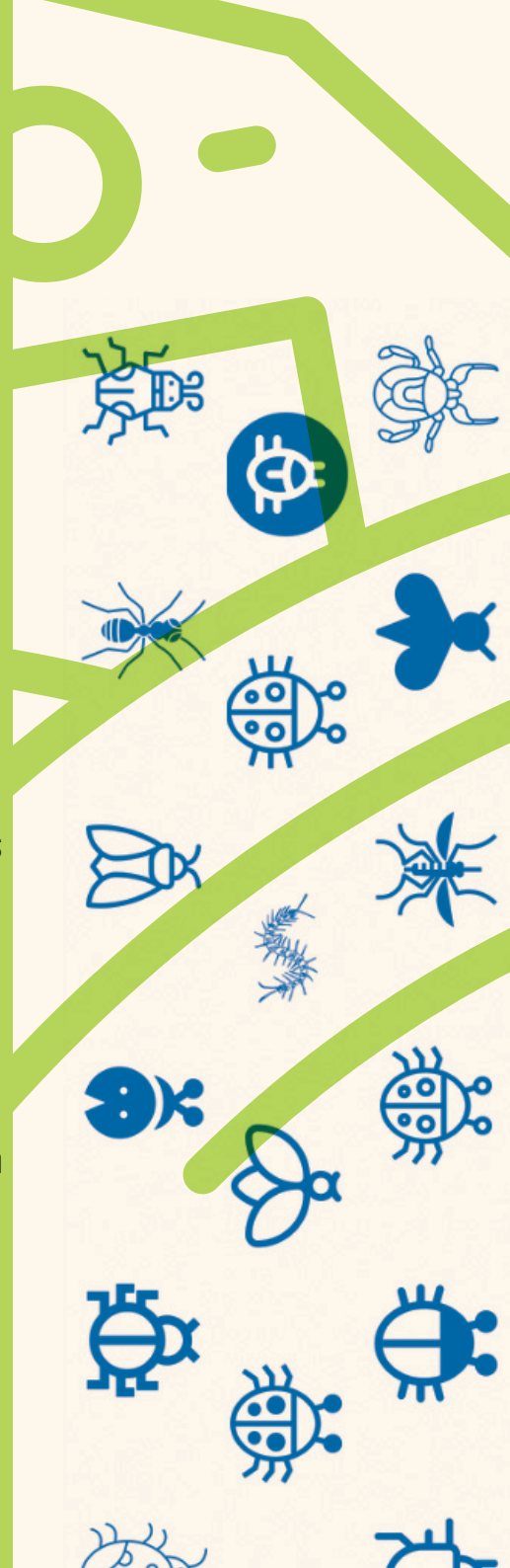
Francois Veillerette

WELCOME

**Message from the President
Francois Veillerette
PAN Europe President
& Director of Générations Futures**

“We were shocked to learn that Portugal is one of the countries where the effects of glyphosate are most devastating and aggressive. This is why we decided to protect the health of our citizens by joining the European network of Pesticide Free Towns.”

Luís Newton – President of Borgo di Estrela, Lisbon, Portugal



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. The network's projects and campaigns are coordinated by five autonomous regional Centers. 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 center in Europe. Located in Brussels, it was founded in 1987 and brings together 46 consumer, public health, and environmental organizations, trade unions, women's groups and farmer associations from across 27 European countries and the UK.

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 health and that of agricultural workers,

the protection of the environment, and the sustainability of future farming.

Why the fight against pesticides is important

All of us are exposed directly or indirectly to pesticides and other agrochemicals. 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 microorganisms, and they end up in our food too.

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.



WHO WE ARE & WHAT WE DO

Why the fight against pesticides is important

“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 sales in the EU

According to latest data, in 2018 almost 400,000 tonnes of pesticides continued to be sold in Europe, with the vast majority used in the agricultural sector.

Pesticide use across Europe remains high, which aside from being dangerous is also foolish

The use of pesticides on average in Europe did not decrease in recent years despite the growing debate on the sustainability of the intensive agricultural model, and despite the entry on the market of pesticides that can be used at low doses.

According to Eurostat, among the 14 EU Member States for which complete data are available for all major groups in both 2011 and 2018, the highest increase in pesticide sales was recorded in Cyprus (+94%), followed by Austria (+53%), France (+39%) and Slovakia (+38%)¹.

What's more, the widespread use of chemical inputs – pesticides and synthetic fertilisers - is “responsible for an increase in the prevalence of numerous diseases among farmers, and there are strong concerns about their impact on our food, including drinking water. European agriculture is also

threatening biodiversity, the loss of which is causing alarm. In the space of one generation, 20% of common birds have disappeared, and some regions are lamenting the loss of three quarters of all flying insects. This picture should also include the destruction of tropical forests, which we indirectly ‘import’ through the soybean produced in South America”, according to independent policy research institute IDDRI².

Moreover, a 2019 study³ also showed that “agroecological farming systems have the potential to produce higher incomes than farms that follow the conventional logic”. The empirical material presented in the study shows “the huge potential and radical opportunities that Europe’s often silent, ‘agroecological turn’ offers to farmers that could (and should) be the basis for the future transformation of European agricultural policies, since agroecology not only allows for more sustainable production of healthier food but also considerably improves farmers’ incomes. It equally carries the promise of re-enlarging productive agricultural (and related) employment and increasing the total income generated by the agricultural sector, at both regional and national levels.”

² Poux, X., Aubert, P.-M. (2018). An agroecological Europe in 2050: multifunctional agriculture for healthy eating. Findings from the Ten Years For Agroecology (TYFA) modelling exercise, Iddri-ASCA, Study N°09/18, Paris, France, 74 p.

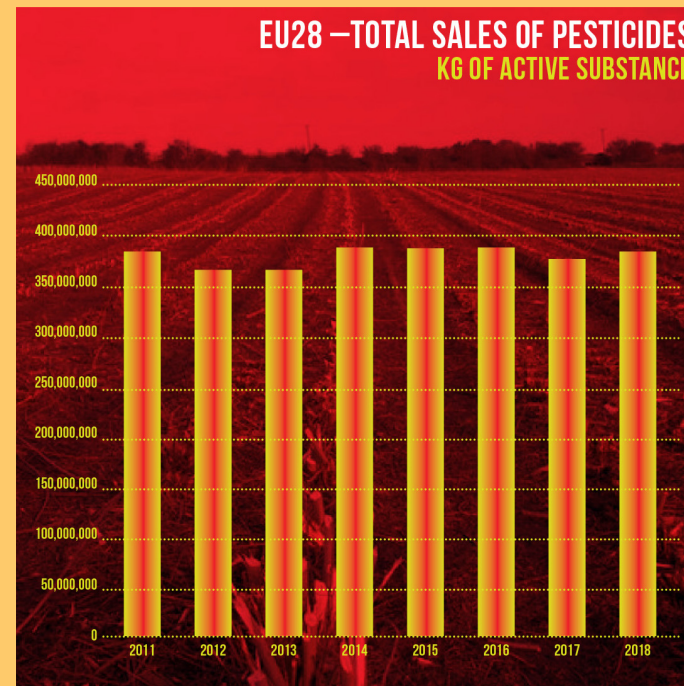
³ Jan Douwe van der Ploeg, et al., Journal of Rural Studies, <https://doi.org/10.1016/j.jrurstud.2019.09.003>



WHO WE ARE & WHAT WE DO

Pesticide sales in the EU

Pesticide use across Europe remains high, which aside from being dangerous is also foolish



In 2018 almost 400,000 tonnes of pesticides were sold in Europe, with the vast majority used in the agricultural sector.

Source: <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/DDN-20200603-1#:~:text=Statistics%20on%20sales%20of%20pesticides,per%20year%20in%20the%20EU>

¹ Eurostat, Sales of pesticides in the EU (up to 2018), <https://ec.europa.eu/eurostat/web/products-eurostat-news/-/DDN-20200603-1#:~:text=Statistics%20on%20sales%20of%20pesticides,per%20year%20in%20the%20EU>

It is now high time for farmers to 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-chemical alternatives, only applying pesticides as a last resort.

PAN Europe activities

- + Informing citizens and policy makers and raising awareness on pesticide issues, regulations, and non-chemical alternatives through reports, factsheets, policy briefings, press releases, blog contributions and social media.
- + Inspiring citizens' actions and amplifying the voices of those affected by pesticides
- + Influencing EU decision-making process by informing politicians on the scientific research updates 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.
- + Organising workshops, conferences, webinars and policy seminars
- + Promoting dialogue for change among governments, the 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*



WHO WE ARE & WHAT WE DO

PAN Europe activities

European Union laws of interest to pesticides

We currently observe a deterioration of biodiversity in agricultural landscapes, and the dramatic losses are increasingly discussed by the public (European Commission, 2018a). Declines of insect biomass of more than 70% in the last few decades in Germany, the halving of farmland bird populations in Europe and effects on pollinators are widely known (Donald et al., 2001; Potts et al., 2010; Hallmann et al., 2017). Out of a set of recorded parameters of agricultural intensification (such as field size, fertilizer application, landscape heterogeneity) a unique, pan-European study identified pesticide application as the responsible factor for lower biodiversity of plants, ground beetles,

What we do to ensure rigorous implementation of the EU pesticide legislative framework

PAN Europe is actively involved in the EU's decision-making process concerning plant protection products (PPPs). 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.

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

PAN Europe board

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Paule Yacoub | *2019 Intern*

WHO WE ARE & WHAT WE DO

What we do to ensure rigorous implementation of the EU pesticide legislative framework

PAN Europe board

PAN Europe team

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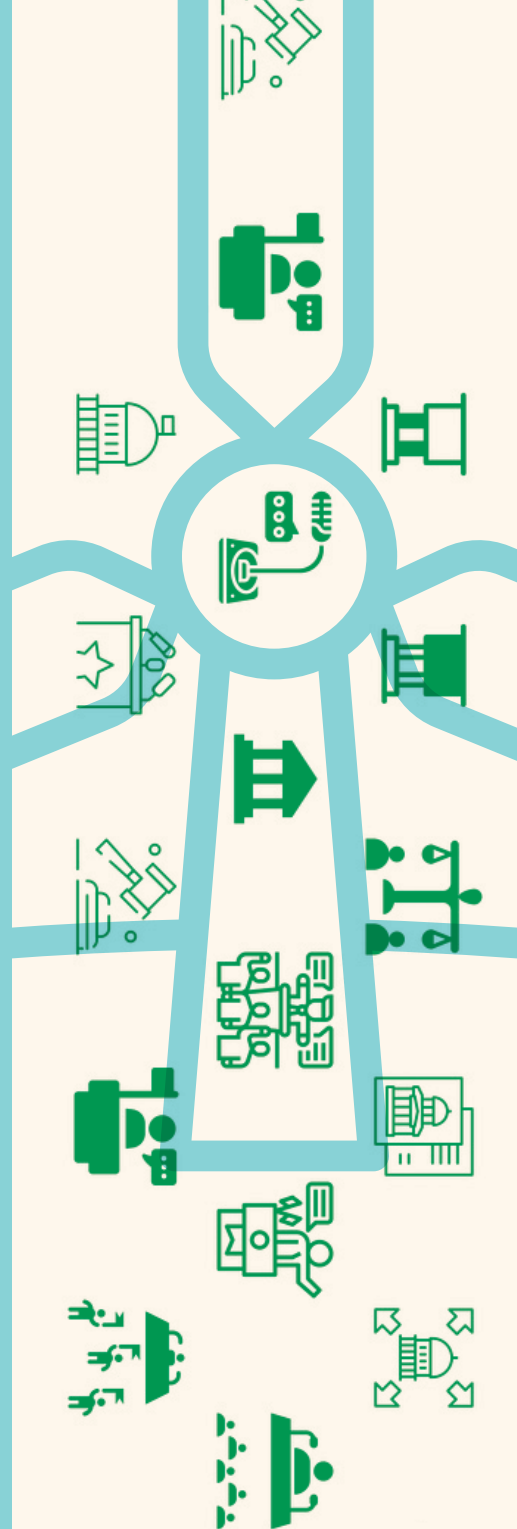
and birds in wheat fields (Geiger et al., 2010). Recently, a review recognized chemical pollution including pesticides as the second most important driver for the worldwide decline in insect populations (Sánchez-Bayo and Wyckhuys, 2019). Other drivers were habitat loss and conversion to intensive agriculture, fertilizer inputs, introduced species, and climate change.

European Environment Agency 2020

Pesticide policy has been right on top of the political agenda in the eventful year of 2019. Issues related to pesticide authorisation and use in Europe and the problems in the implementation of EU pesticide policies - PAN Europe's main working areas - have regularly been in the spotlight of EU policymaking, with the Pesticide and Maximum Residue Limits Regulations under review for their effectiveness under the REFIT evaluation.

In addition, the European Parliament elections (which famously resulted in a 'green wave' across Europe) and the Commission takeover by the new Von der Leyen cabinet heralded a new, sustainability-based EU approach to the social and environmental challenges we face, with the announcement of the flagship EU Green Deal. In December 2019, when launching the European Green Deal, the [new college of the European Commission took a strong stance](#) in its approach towards the importance of reducing the EU's pesticide dependency.

In terms of food and farming's role in the health-environment nexus, the Green Deal will feature the Farm to Fork and Biodiversity Strategies, expected to set highly ambitious sustainability objectives, which will greatly impact pesticide proliferation in the EU.



Policy results of PAN Europe's work – 2019 highlights

- + Publication of the [European Green Deal](#) (including **Farm to Fork & Biodiversity Strategies**) clearly addressing the need to reduce dependency on intensive agriculture and set forth sustainable food & farming alternatives in the EU.
- + Neurotoxic pesticide **Chlorpyrifos was finally banned** in 2019!
- + By endorsing the European Green Deal, in 2019 the new Commission also [committed to produce a Chemicals Strategy](#) to protect citizens and the environment better against hazardous chemicals, addressing mixtures and EDCs.
- + **Pesticide taxation uptake** was raised considerably in 2019 in a number of EU member states.

POLITICAL UPDATES ON EU PESTICIDE POLICY

Policy results of PAN Europe's work – 2019 highlights

Highlighting PAN Europe's work in 2019

- + Launching a European Citizens' Initiative to '[Save Bees and Farmers!](#)'
- + [Neurotoxic pesticide Chlorpyrifos finally banned!](#)
- + [7th SUD Symposium on IPM and pesticide reduction](#)
- + 1st conference on '[Pesticides and Biodiversity Loss: solutions & Political Actions](#)'
- + [Flash mob](#) in Brussels for the launch of Save Bees and Farmers ECI

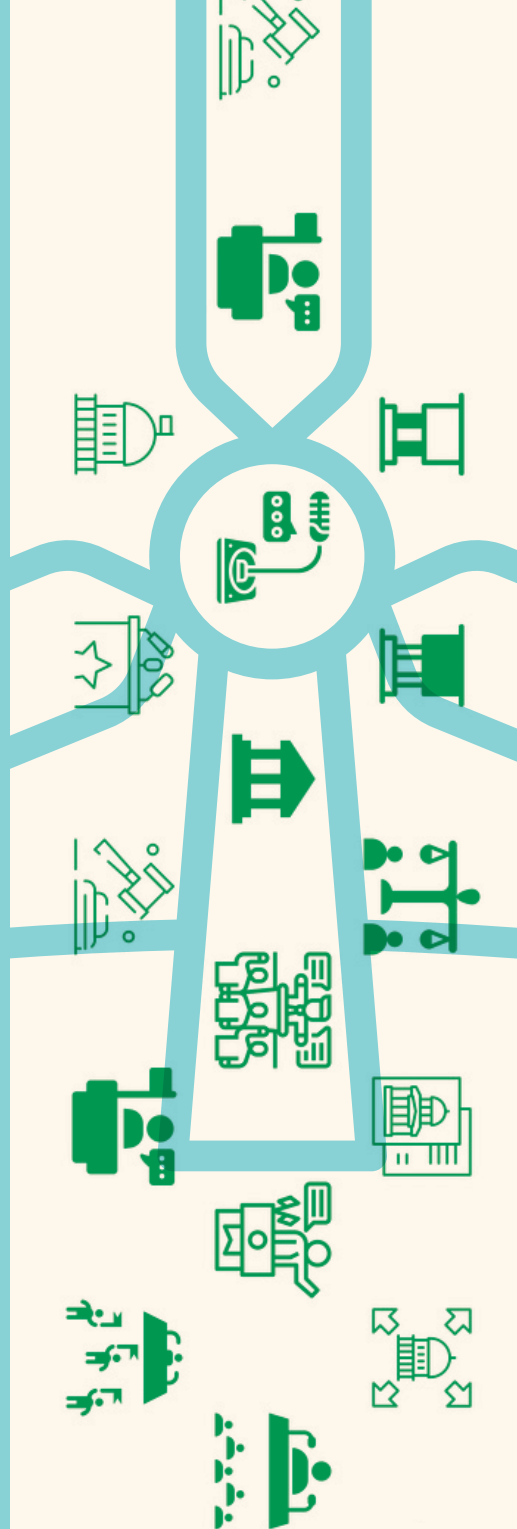
POLITICAL UPDATES ON EU PESTICIDE POLICY

"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

- 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.
- + **European Parliament [resolution adopted on 12th February 2019](#)** on the implementation of Directive 2009/128/EC on the sustainable use of pesticides. The report takes up several of PAN Europe's concerns and demands, including:
 - Recognising the objective of reducing pesticide dependency (art. A)
 - Recognising insufficient implementation of the SUD by the Member States and deplores

- + The need for **risk assessment of combination effects of chemicals** was finally recognized by the European Commission in 2019.
- + The **protection of biodiversity** was a high priority in the political agenda in 2019, as was confirmed in the European Green Deal published by the new Commission, which recognises the impact of pesticides on water and soil. This impact will be particularly addressed under the EU Green Deal's [Biodiversity strategy 2030](#) and "zero pollution action plan for water, air and soil".
- + The European Commission started **taking measures against the abuse of derogations** in Member States in 2019.
- + Establishing **serious data requirements with further testing in the EU chemicals assessments** to fill in the gaps of knowledge in relation to endocrine disruptors is now among the goals committed to by the new European Commission (eg fitness check of EDCs).
- + **European Parliament [resolution adopted on 16th of January 2019](#)**, 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



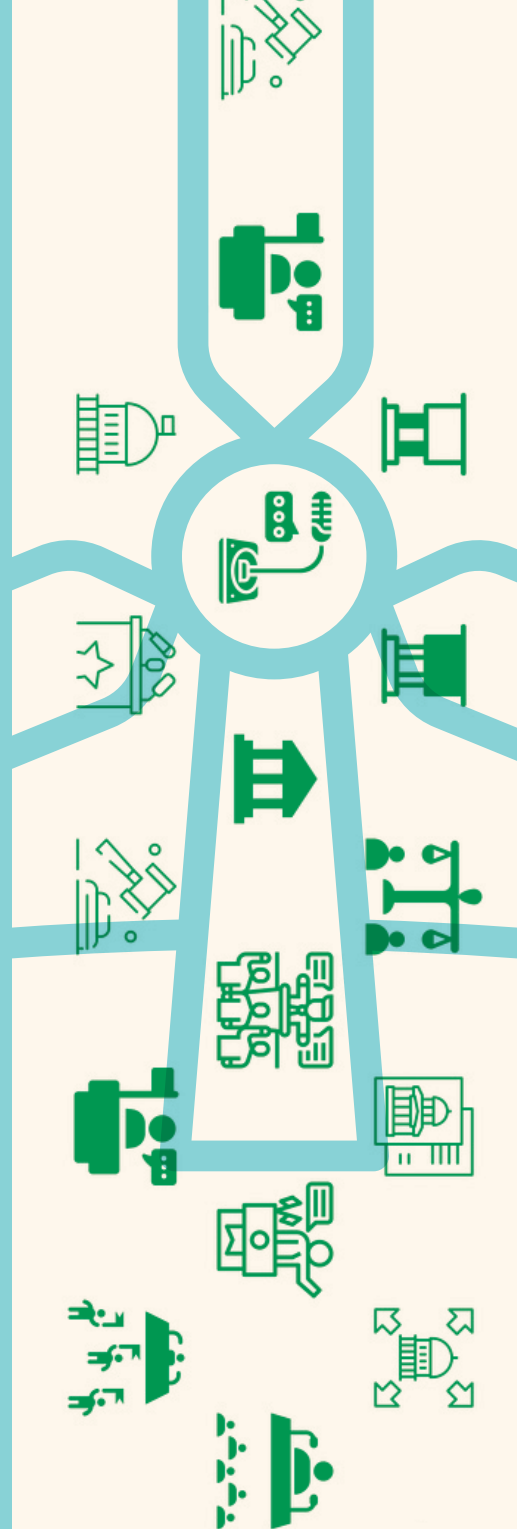
the 3 years delay in submission of the implementation report on the directive by the Commission (art. 3)

- Condemns the lack of commitment to IPM practices by Member States (art. 8)
- Stresses that the CAP in its current form does not sufficiently encourage and incentivise the reduction of farms' dependency on pesticides and the uptake of organic production techniques (art. 18)
- Deplores the lack of linkage between the SUD and the new CAP, as well as the fact that IPM principles are not included in the new CAP proposal (art. 19)

What we expect from EU institutions in 2020

European Parliament

- + Be our ally in the revisions of the pesticides and maximum residues limits authorisations as well as the Sustainable Use of Pesticides Directive (SUD)
- + Follow developments 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 the precautionary principle, also relevant to the pesticide refit process.
- + Support our actions on protecting bees (Bee Guidance Document, Bee toxic pesticides)
- + Support our demands to strongly reduce the use of derogations for banned pesticides

European Commission

- + Take a strong stance in the triilogue CAP negotiations to impose strong environmental protection objectives.
- + Revise the SUD introducing quantitative use reduction targets in line with the Farm to Fork and the Biodiversity Strategies, 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 send pesticide use data to competent authorities
- + Protect the pesticide regulation's hazard-based approach in the frame of the Fitness Check process and implement the precautionary principle in pesticide decisions.

POLITICAL UPDATES ON EU PESTICIDE POLICY

What we expect from EU institutions in 2020

European Parliament

European Commission

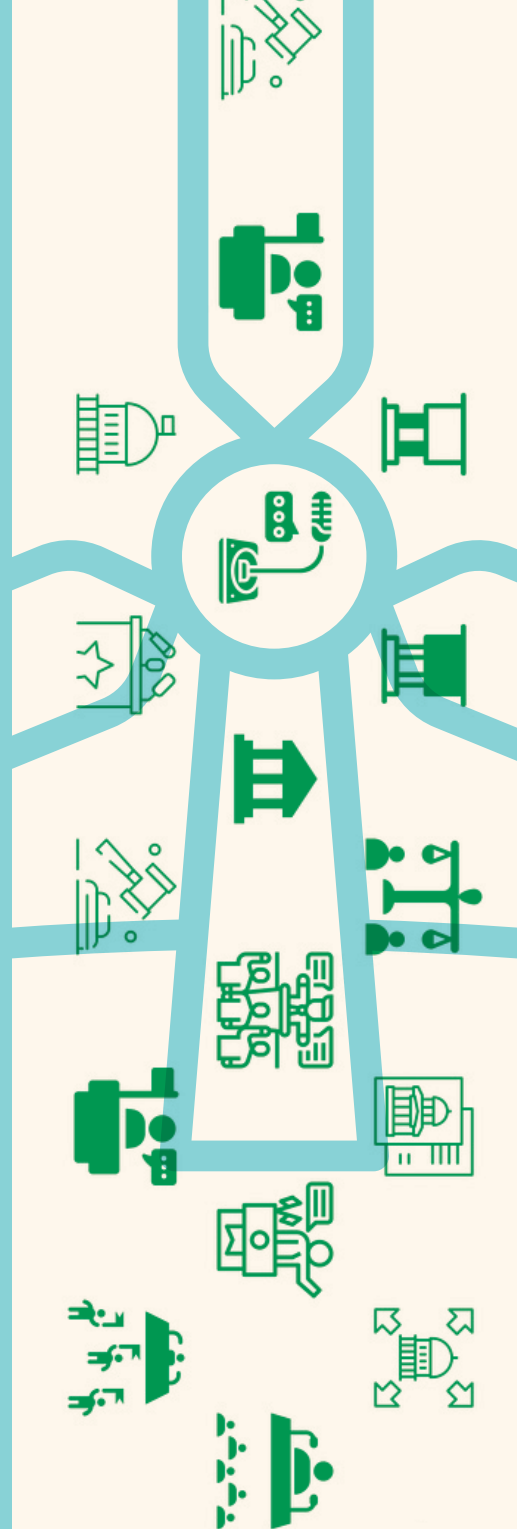
“Even as an American, I am a supporting member of PAN-EU and am reliant upon their cutting-edge research and policy initiatives. As an international leader in pesticide reform, PAN-EU's work provides me with information and policy approaches that can be utilized in the United States and beyond.”

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*

- + Give priority to human health and the environment in the fitness check revision of the European policies on endocrine disruptors.
- + Move forwards in the update of guidance documents for risk assessment and enforce monitoring and mitigation measures in member states to significantly improve protection of human health and biodiversity from pesticide use.
- + Make sure that the discussions around the Bee Guidance Document are science-based
- + Continue publishing annual sales 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 turning a blind eye to the too many derogations given to banned pesticides by Member States to use unauthorized pesticides, and ensure the pesticide regulation package is finally implemented

European Council (Member States)

- + Start effectively implementing the SUD, stop granting derogations on banned pesticides.
- + Start publishing pesticide use trends (as foreseen in Article 15 of the SUD).



POLITICAL UPDATES ON EU PESTICIDE POLICY

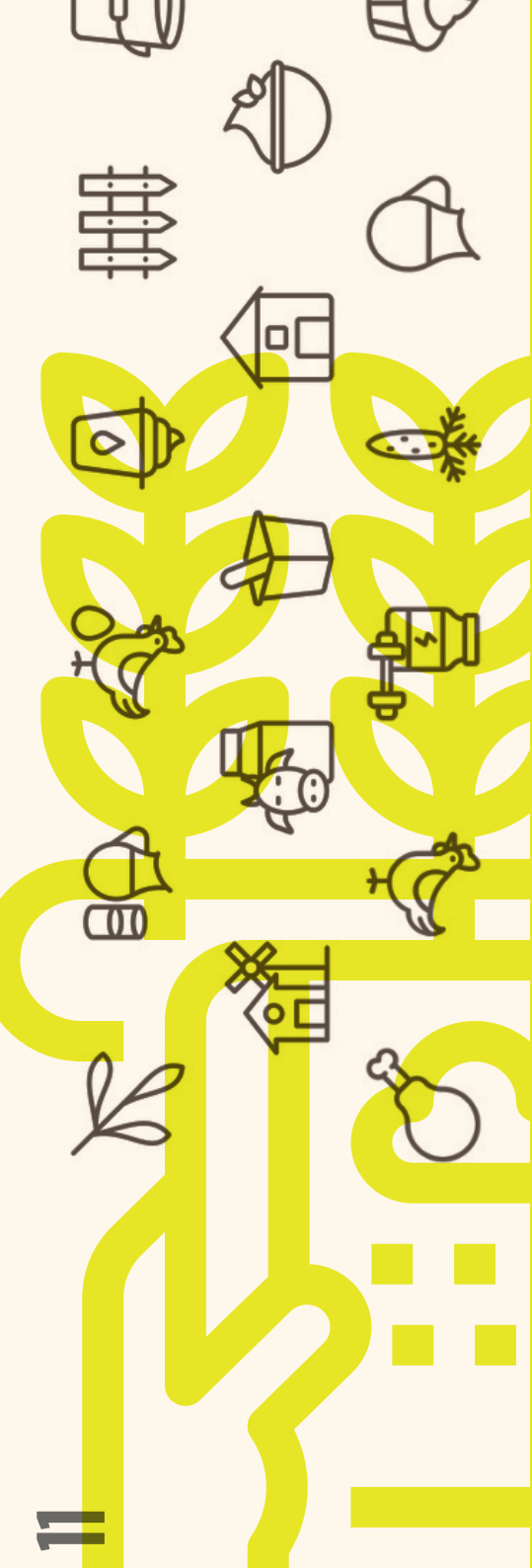
European Council (Member States)

“The work of civil society organisations like PAN is vital for us the decision makers by bringing the evidence, showing us the loopholes that need to be fixed and by connecting us with the public. But I value the PAN Europe particularly for its knowledge and its dedicated work for well-being of the citizens and farmers, sustainability of our agriculture and non-toxic environment. The work against the dangerous pesticides is what brings us together, our joint endeavour, which I believe should be a political priority. We have to finally admit that hazardous pesticides do no good to pollinators. We need pollinators, which however means that to save them, we have to substantially cut down their use and substitute them with safe alternatives, that do not have to be pesticides.

I support the Farm to Fork Strategy goal to reduce by 50% by 2030 the overall use and risk of chemical pesticides. I would like us to be even more ambitious. Not only to save the bees, but also for the good of our health and environment. I believe that concentrated effort of the whole society and political will could bring us to agriculture without hazardous synthetic chemicals. But to get there, we have to first and foremost put the CAP and the framework for authorization of pesticides on the right foot. The citizens remind us of our responsibility. The Bee guidance document, that has been watered down by the Member States behind the closed doors, is a perfect example where their mobilization is urgently needed.”

Martin Hojsik – MEP (Renew Europe)

Committee on the Environment, Public Health and Food Safety



In 2002, PAN Europe started a campaign on pesticide use reductions called PURE, which resulted in the [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 a society less dependent on pesticides. It calls for uptake of low-impact management in both agricultural 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, Member States shall:

- + 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.

- + Develop so-called National Action Plans (NAPs) explaining how they will ensure implementation of the SUD, by providing, among others, answers on how to fulfil the above requirements (unfortunately, these NAPs suggest little or limited ambition).

In 2019, PAN Europe helped several national members with legal arguments on how to use EU law to introduce a general ban on using pesticides in public spaces and private gardens. For example, France and Belgium used article 12 of the SUD (and the precautionary principle) as legal principles to ban pesticides in public areas. Luxembourg used the regulation on pesticides 1107/2009 as arguments to ban glyphosate (glyphosate authorisation is up for revision in EU in 2022), while Austria only referred to its national pesticide regulation. In the case of Austria, the EU ultimately objected to the decision, while the Luxembourgish ban did not raise any concern on the side of the EU, hinting to the effectiveness of the PAN Europe approach.

OUR HISTORY & ACTION ON THE SUSTAINABLE USE DIRECTIVE

According to EU directive on SUD of pesticides, Member States

“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 (Socialists & Democrats), Sweden

To date, the following areas have established bans going beyond EU law:

- + Luxembourg total ban on glyphosate
- + The Brussels Region has a total ban on neonicotinoids
- + Belgium and French ban on use of pesticides in private gardens
- + A number of MS (including Belgium and France) banned partially or totally the use pesticides in public areas

In 2019, PAN Europe also contributed to the objective of phasing out of lower VAT levels for pesticides. It was decided more than 20 years ago to have pesticide use statistics as part of the so called agro-environmental indicators of the CAP (IRENA project). In 2019 the European Commission [released](#), for the first time ever, information about pesticide use statistics across Europe. This will certainly help improve pesticide use monitoring and as a result contribute to achieving significant pesticide use reductions as required by EU law.

PAN Europe has long held the belief that placing a tax on pesticides can be a significant tool in reducing pesticide dependency; in 2019, this idea gained recognition as more and European countries (and Switzerland) are

considering to introduce a tax. As such, PAN Europe is proud to have contributed to the goal of achieving pesticide taxation in Germany, France, Belgium, Czech Republic, Estonia, and Sweden.

The Sustainable Use of Pesticides Directive is up for revision in 2020, and PAN Europe will be fighting to upgrade article 12 to include the precautionary principle for the introduction of the legal basis for a ban on pesticides. Having created a number of precedents in the last years in this area will help make this argument in the upcoming debates.

Highlights in 2019

- + In 2019, PAN Europe contributed to making pesticide use and risk reduction and promotion of sustainable alternatives one of the priorities of [European Green Deal](#) and [Farm to Fork strategy](#) of the new European Commission.
- + In December 2019, together with partners IBMA and IOBC, PAN Europe organized the [7th SUD symposium](#) edition with an event at the European Parliament. Scientific knowledge and practical testimonies were presented to feed the debate on

OUR HISTORY & ACTION ON THE SUSTAINABLE USE DIRECTIVE

Highlights in 2019

“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 resort 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

OUR HISTORY & ACTION ON THE SUSTAINABLE USE DIRECTIVE

how European policies could help accelerate the necessary ecological transition towards a safe and environmentally-sound agriculture. The audience included, among others, Members of the European Parliament Martin Hojsik, Frederick Federley (Renew Europe) and Sarah Wiener (Greens/EFA), Jytte Guteland (S&D) as well as academics and representatives of EU Institutions (Commission, DG SANTE, etc).

- + On the 12th of February 2019, the [European Parliament voted for a resolution](#) on the implementation of Directive 2009/128/EC on the sustainable use of pesticides. The report specifically addresses sensitive areas (article 12 of the SUD), for example by recognising the use of pesticides in public areas as inappropriate, and welcoming regional initiatives in Member States (art. 33). It also expressed concern that many Member States have not interpreted the requirement of Article 12(a) correctly, and noted that the Commission has confirmed that there is no legal reason why agricultural application should be excluded from the provisions of Article 12 (Art. 34).

“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 trade of prosecco (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 – Citizen, Italy

The EU Directive on the 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) giving wherever possible priority to non-chemical methods.

Many aspects of Integrated Pest Management (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, non-crop vegetation attracting and protecting pollinators and 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.

Despite this long history, IPM is not seriously taken up by farmers across Europe. The main problem is that within the EU legislation, the SUD has not been included into the EU Common Agricultural Policy (CAP) which each year offers 60 billion to the farming sector.

The CAP reform proposal, still under discussion in 2019, and meant to be implemented as from 2023 proposes to shift policy from compliance to performance towards a so-called “New Delivery Model”, with broad policy objectives and common performance indicators. But this reform proposal fails by excluding the concept of IPM from cross compliance, not spelling out the importance for farmers to apply agronomy first and by not making pesticide use, but pesticide risk, the main indicator.

At the end of 2019 however, the European Commission published its European Green Deal putting pesticide dependency discussions very high on the EU’s policy agenda. We look forward to seeing this approach translated into several EU policy tools.

PAN Europe's action on agriculture

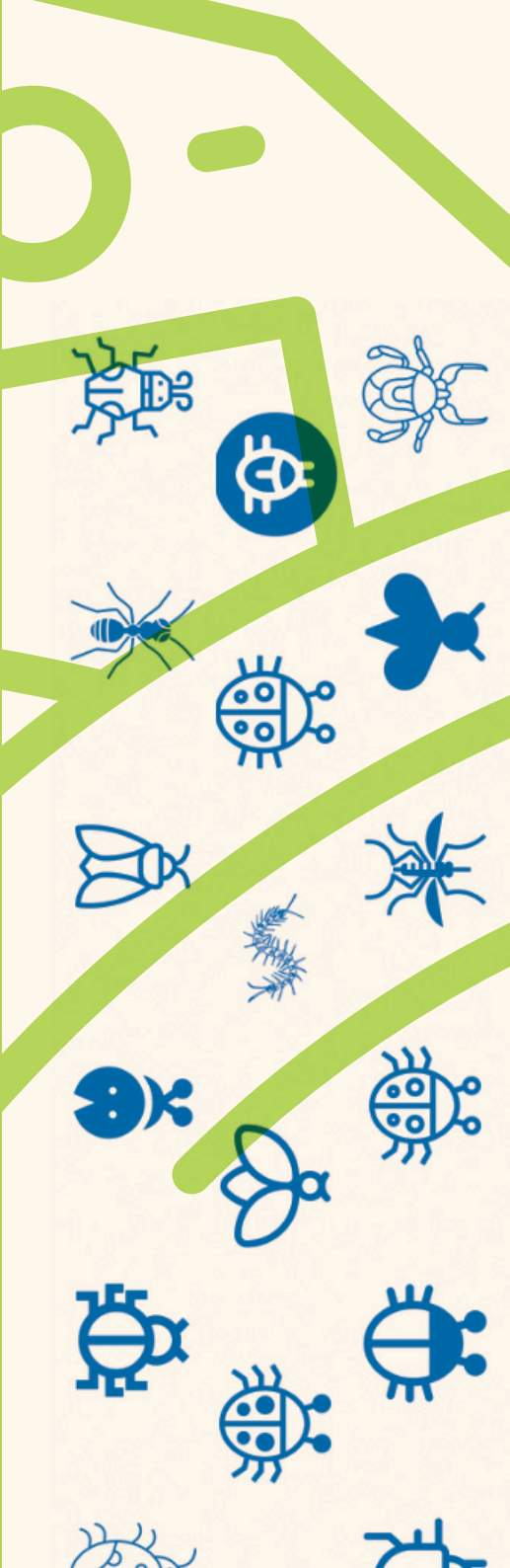
PAN Europe advocates for pesticide dependency reductions, encouraging policy changes towards ensuring that farmers apply integrated pest management based on solid agronomic practices to prevent pest build-up and on the use of non-chemical alternatives

AGRICULTURE

PAN Europe's action on agriculture

“I’ve been able to drastically reduce my use of fungicides, insecticides and slug pellets. I rotate every 9 years between 6 different crops. It involves mechanical weeding and using staggered sowing dates to prevent problems with insects and diseases. We have to change our level of tolerance compared to traditional agriculture. I’m prepared to accept a few weeds in my fields or a slightly lower profit due to a fungal disease or insect, as long as it remains economically viable. This loss of earnings is more than compensated by the savings I make from not using pesticides.”

Jean-Bernard Lozier
Organic producer of cereal, linseed, rapeseed and protein crops in Coudres, France



to work with not against nature. 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.

In 2019, [7th Annual IPM Symposium “Ecological Transition Starts with Agronomy, Increasing IPM Uptake and Reducing Pesticide Dependency”](#) was organised in the European Parliament hosted by Martin Hojsik and Michal Wiezik. Its focus was on the uptake and scale up of IPM.

Building on the exhibition ‘IPM – working with nature’ organised in past years together with [International Organisation of Biological Control \(IOBC\)](#) as a means to explain what the IPM approach entails in specific crops,

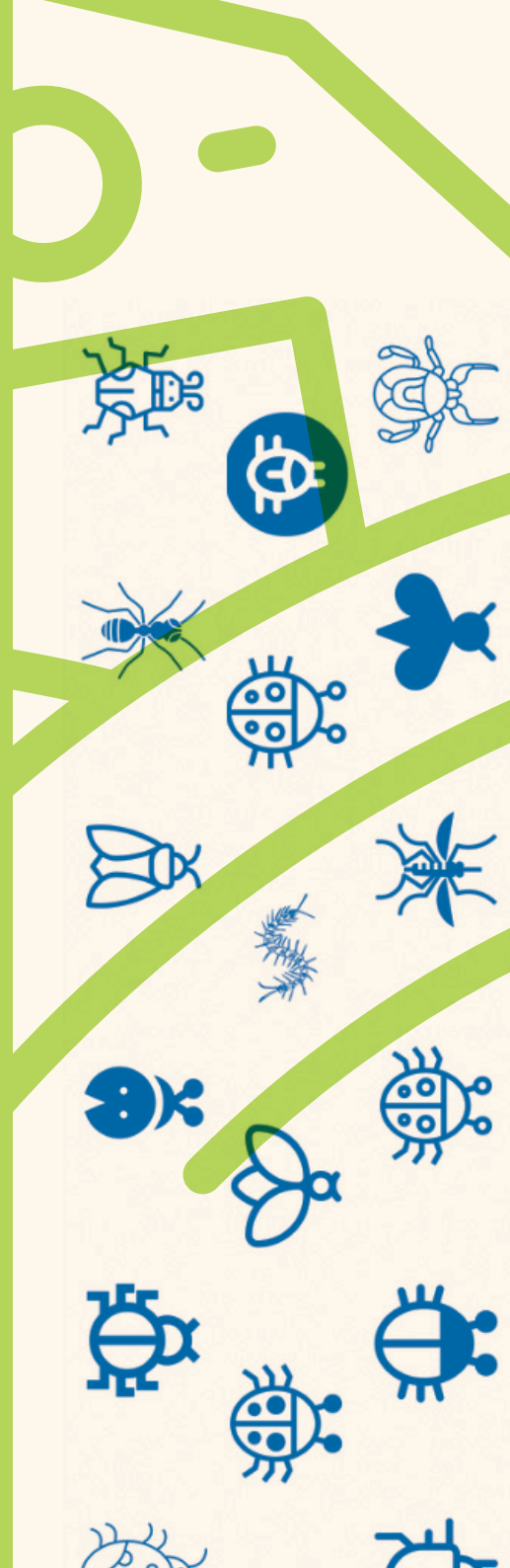
PAN Europe has put together short technical videos presenting the main posters, as well as [testimonies of farmers](#) (in arable crops as well as apple and grape production) on their experience with IPM. In 2019, PAN Europe also organised farm visits showcasing IPM uptake in different agronomic sectors.

PAN Europe continued 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. In 2019, we developed a number of position papers containing concrete proposals on how to make the CAP to deliver on reducing EU’s dependency on pesticides, on precision farming, on advisory services.

We also actively took part in the discussion on how to measure the reduction in pesticide use dependency. An exchange which unfortunately – despite the European Green Deal – remains of high actuality.

“When you use pesticides, you are not working according to “Nature’s calendar”, but rather against it, following the “calendar” set by the manufacturers of phytosanitary products. We think, based on our experience, that if you have a “living” soil, with a strong biodiversity base, you can have better wine.”

Silvano Brescianini
Organic wine producer
in the Francia Corta region, Italy



The European Union has one of the best regulations for pesticides in the world – in theory. In practice, however, it is not implemented as it ought to be according to EU law.

In order to ensure that the new Commission puts the problems resulting from pesticide use on the top of its political agenda, PAN Europe continued working together with NGO networks and scientific experts particularly via [Citizens for Science in Pesticides Regulation \(CSPR\)](#) coalition and Risk Assessment Reform (RA reform) campaign, and the European Parliament. Ahead of the publication of the evaluation of Pesticide and MRL Regulations (REFIT), PAN Europe kept giving emphasis on the systemic failings of the pesticide authorisation procedure that result in harmful pesticides entering the market and calling upon regulators to implement the Pesticide law and its hazard-based approach, rather than modifying it.

In January 2019, the Members of the European Parliament adopted the PEST Committee resolution, which lists 114 recommendations to boost trust in the EU approval procedure of pesticides, by making it more transparent and accountable. The resolution was called

the “blueprint” to improve EU pesticides approval procedure and is directed to the Commission, Member States, EFSA and ECHA. This is a milestone in the long-needed pesticide risk assessment reform in Europe, [highlights](#) PAN Europe.

PAN presented the findings of the 2018 “[White Paper](#)” in [two expert meetings](#), with DG SANTE and EFSA aimed at influencing the Regulatory decisions on REFIT and ultimately to ensure a higher level of protection from pesticides in Europe. The RA reform campaign contributed to making the improvement of risk assessment of hazardous chemicals one of the 6 main topics of the high-level conference “[EU Chemicals policy 2030](#)” in June 2019.

PAN Europe continued to advocate on the need to address the combined effects of pesticides and followed the developments on the risk assessment of pesticide mixtures. As a result of this work, the issue and need for risk assessment of combination effects of chemicals was finally [recognized](#) by the Commission.

In the winter of 2019, the new Commission endorsed the [European Green Deal](#), and [committed to produce a Chemicals Strategy](#) to protect citizens and the environment better against hazardous chemicals, addressing mixtures and EDCs.



“One of the main principles of the Integrated Pest Management approach is cultivating a large variety of crops on the farm. I have seven to eight crops on my farm depending on the year. I have winter, spring and even summertime crops. I haven’t used any insecticides for 3 years now, and I haven’t had any major disaster because of it. The wide variety of crops also helps me to spread my financial risks, as well as share out the work over the course of the year.”

Emmanuel Drique
Organic producer of cereals,
rapeseeds and pulses, Bezu St Eloi, France

Following the Commission's proposal to increase transparency, as a response to the "Stop glyphosate" ECI, PAN Europe together with other NGOs worked to [prevent the transparency proposal](#) from being watered-down in the trialogue discussions, endorsed in 2019. As a result, pesticide safety studies will be proactively published for public scrutiny once the regulation enters into force in 2021.

In June 2019, PAN Europe was invited to present its risk assessment reform work, highlighting the shortcomings of the pesticides risk assessment and proposing concrete solutions, at the "[Science and Politics of glyphosate](#)" academic conference at Erasmus University Rotterdam. This resulted in an invitation to some of the authors of the "White Paper" to submit an article for publication in *Journal of European Risk Regulation*, which will be published in 2020.

Pesticide residues & mixtures

In 2019, PAN Europe followed closely the work of the European Food Safety Authority (EFSA) on mixtures of pesticide residues, including endocrine disruptors. For decades, scientists have been raising the alarm that chemical mixtures may magnify the toxic potential of individual chemicals alone, including pesticides,

making the safety assessment of "one single chemical" unfit to guarantee consumers' safety.

EU law requires since 2005 to address the cumulative and synergistic effects of pesticides in safety assessment, yet Regulators continue to carry out safety assessments as if humans were exposed to a single pesticide at a time. However, according to the food residue monitoring data from European Food Safety Authority (EFSA) report in May 2019, a quarter of the food consumed in Europe contains residues of two or more pesticides. For certain foods the situation is much worse: more than 60% of the popular summer fruits tested came with pesticide "cocktails".

An important part of PAN Europe's work in 2019 was to [assess EFSA's two pilot studies on the impact of dietary exposure to pesticide mixtures](#) on human health, particularly on the study examining impacts of pesticides on chronic thyroid toxicity. PAN Europe revealed the biased conclusions of the study, ultimately raising public awareness on the absence of an adequate safety assessment for pesticide mixtures present in our food and stressing that this not only fails to address EU law requirements, but it also puts consumer health at risk in a clear violation of human rights.



PESTICIDE RISK ASSESSMENT REFORM

Pesticide residues & mixtures

As an immediate action PAN Europe requests to add an additional safety factor of 10 when assessing the safe exposure levels to pesticides, to address exposure to mixtures.

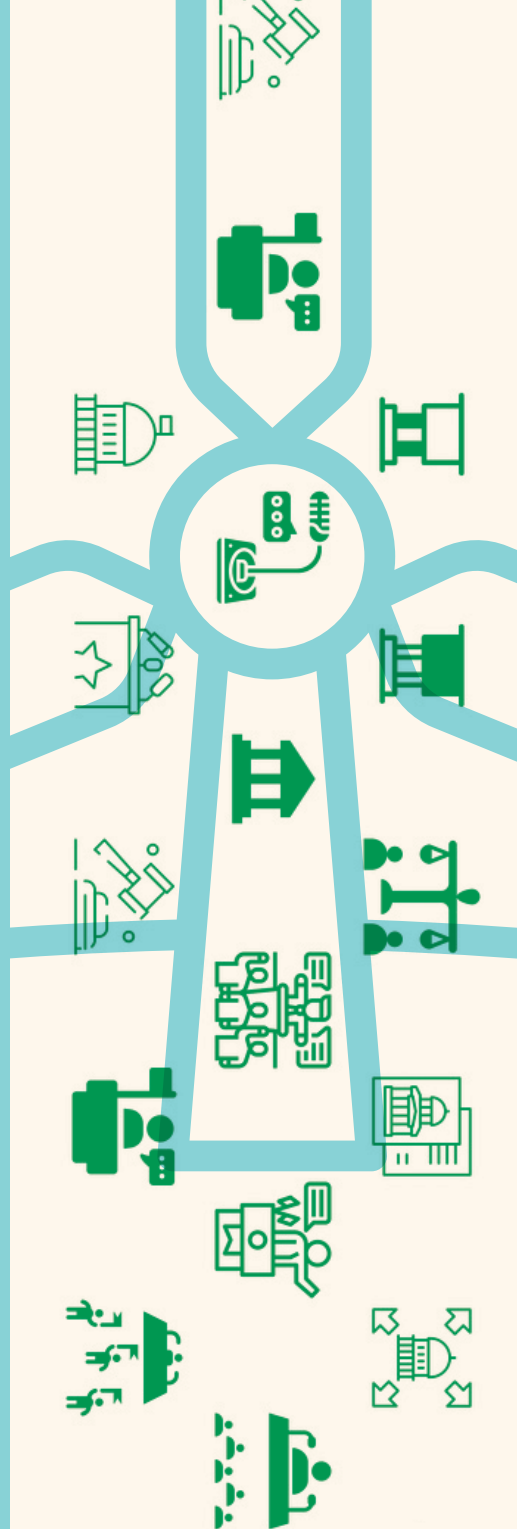
Finally, in 2019 PAN Europe carried out a small research on residues of EU-banned pesticides in imported versus EU food and examined the implementation Pesticides and MRLs law. The work was presented at '[Pesticides, Poisoning and the Politics of Agrichemicals](#)' event in Berlin in May and received publicity in international media¹.

¹ Bom dia Brazil <https://cutt.ly/Hr4aXJE>;
Afisa-PR <https://cutt.ly/Wr4a2PD>;
Reporter Brasil <https://cutt.ly/cr4a5Xb>

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.

Following an access to documents request and a two-year legal battle against the Commission to disclose certain documents, PAN Europe [exposed publicly in 2019](#) how certain EU officials fought against setting sensitive scientific criteria for EDCs to identify pesticides that are endocrine disruptors and remove them from the market as the EU law requires. The ED-policy scandal was spread across the European media.

However, even with a “bad” set of scientific criteria, pesticides that are EDCs will never be identified if the toxicity testing is not done and delivered to authorities. This is what PAN Europe's 2019 report [“Trapped in a vicious cycle”](#) revealed, based on a 12-month research examining 33 authorization decisions under the pesticide regulation since 2009.



The report reveals that in 31 out of the 33 cases the approval was given without any scientific test to check if they caused harm to the human endocrine system.

EDCs in chemical mixtures were once again in the focus of PAN Europe's work in 2019. In the official food residue monitoring EFSA report, some of the pesticides most often detected are EDCs. For example, chlorpyrifos, which is a neurotoxic insecticide shown to affect brain development in children, was one of the pesticides most often found in EU food and most often exceeding the Maximum Residue Limits. Boscalid, an endocrine disrupting fungicide, is in the top 5 pesticides detected and glyphosate, the active ingredient of Monsanto's (now Bayer) Roundup, which is classified as a probable carcinogen by the International Agency for Research on Cancer and interferes with hormone synthesis, was detected in lentils (42%), barley (23.5%) and peas (25%), and exceeded the safety limits in honey.

Ban chlorpyrifos!

Chlorpyrifos has been among the most commonly used pesticides in Europe and its residues are often present in fruit, vegetables, cereals and dairy products, as well as drinking water. Exposure to chlorpyrifos, even in small doses, is

ENDOCRINE DISRUPTING CHEMICALS

Ban chlorpyrifos!

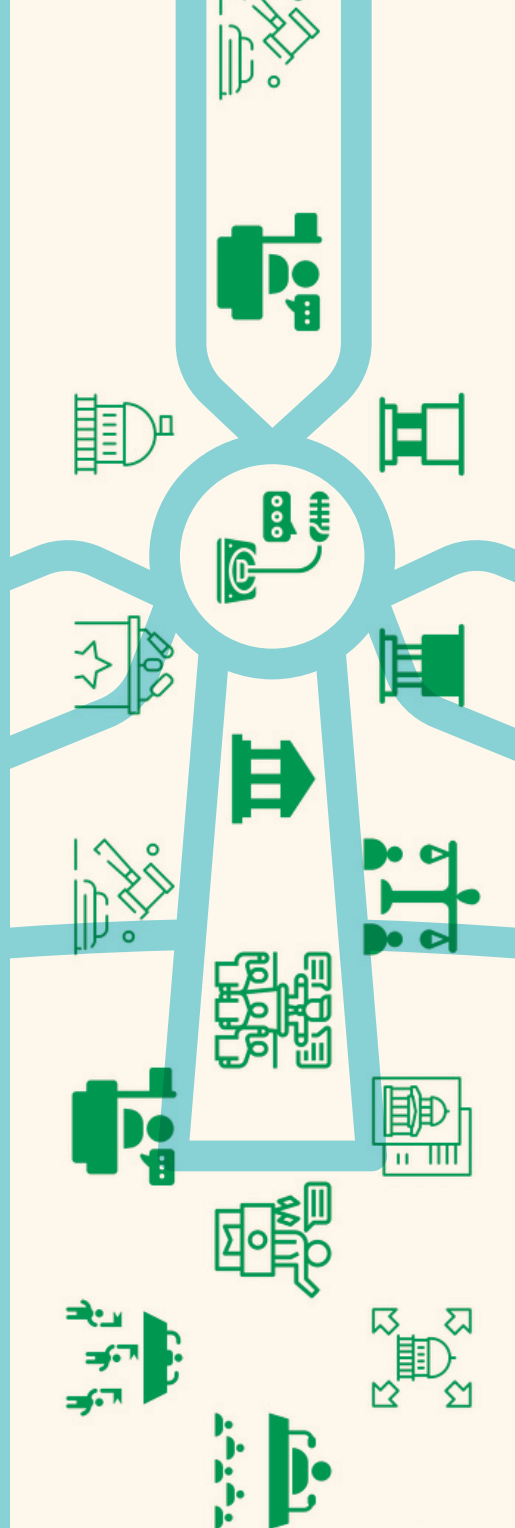
Highlights in 2019

- + In 2019 the Commission launched a ‘fitness check’ to evaluate the relevant EU ED chemicals legislations. [PAN Europe raised concerns on the intentions of this initiative on the roadmap](#), as it creates unnecessary delays whereas the focus must be urgently directed to detect EDCs and eliminate effectively Citizens and environmental exposure.
- + [The European Parliament stood up for European citizens in 2019](#) and adopted a resolution to urge the Commission to take action against a long-known concern: daily exposure to endocrine disrupting chemicals (EDCs) may cause harm to ourselves, our children, the environment and all its species.
- + PAN Europe gave emphasis on the need to develop test methods and fill in the gaps of knowledge in relation to endocrine disruptors (EDs) in [the fitness check for EU legislation on EDCs](#) as well as [in the conclusions of the annual EDC forum](#).

dangerous, particularly to children as it has been linked to neurodevelopmental disorders in children such as increased risk of autism, working memory loss, ADHD and decreased IQ. Many studies point at chlorpyrifos as an endocrine disruptor chemical (EDC), while it has also been associated with metabolic disturbances, breast and lung cancers, and male infertility. Exposure to chlorpyrifos has been shown to cause damage to DNA.

Although less documented, the chemical chlorpyrifos-methyl is very similar in structure to chlorpyrifos and like its sibling, it has potential to damage DNA and cause neurodevelopmental toxicity.

In a [factsheet](#) published by PAN Europe and NGO members and allies in June 2019, which brought together all official EU data on the analysis of 791 different pesticide residues, chlorpyrifos was found to be among the top 15 active substances most frequently found in European unprocessed food and prominently present in fruit.



Simultaneously, over 220,548 citizens backed a [campaign](#) calling on EU governments to ban chlorpyrifos in all its forms, launched by SumOfUs, the Health and Environment Alliance (HEAL), PAN Europe, Générations Futures, Ecologistas en Acción, and PAN Germany.

Following the collaborative action, finally, in December 2019 representatives from European Member States [voted to ban](#) neurotoxic chlorpyrifos and chlorpyrifos-methyl from the EU market, a historic move that has been applauded by health and environment groups as a victory for future generations!

Committee on Agriculture and Rural Development,
Committee on the Environment, Public Health and Food Safety,
Chairman of the PEST
Committee for the European Parliament (2014-2019)

ENDOCRINE DISRUPTING CHEMICALS

“Endocrine disruptors, pesticides, toxic recycling: exposure to potentially dangerous chemicals is a major environmental and health issue. It is essential that Europeans be better protected against these risks. With more than 4 million tons of pesticides used worldwide every year, practices that are more respectful of the environment and the health of animals, farmers and consumers are not a whim but an imperative. In this respect, PAN Europe is an extremely valuable ally, its expertise is undoubtedly an added value in the environmental fight. I fully support the demand of the European Citizens’ Initiative Save Bees and Farmers to phase out all synthetic pesticides in the EU by 2035, as well as concrete measures to restore biodiversity in agricultural areas. This is a matter of public interest.”

Eric Andrieu – MEP (Socialists & Democrats)

In their notorious reports published in early 2019, the UN Food and Agriculture Organization (FAO), the World Biodiversity Council (IPBES) and the Intergovernmental Panel on Climate Change (IPCC)

left no doubt that the lead causes of the global climate and ecosystems crisis are man-made and that their solution requires rapid, far-reaching and unprecedented changes in all aspects of society. These include a radical shift and a fundamental transformation of land use, especially in the way we farm and produce our food.

In the wake of the successful [Stop Glyphosate! ECI](#) (of which PAN Europe was among the initiators) and the ensuing [European Parliament PEST Committee](#), and in view of the upcoming Common Agricultural Policy reform negotiations in 2019 and 2020, PAN Europe and several other EU NGOs decided that the time was ripe to take action on the role of agriculture and its potential as a solution to the climate and biodiversity crises. Together with an alliance of over 140 environmental NGOs, farmer and beekeeper organisations, charitable foundations and scientific institutions from across the European Union, PAN Europe decided to launch a new European Citizens' Initiative calling for a new, bee-friendly model of agriculture for a healthy environment in the EU.

The European Citizens' Initiative [Save Bees and Farmers!](#) wants to become a catalyst for the transformation of agriculture towards a model that is based on agro-ecological principles and that therefore promotes biodiversity. Such an agricultural model preserves natural resources, prevents soil degradation, builds up soil fertility and thus contributes to climate protection by absorbing more greenhouse gases from the atmosphere than it releases. This model is the only possible response to the growing challenges posed by the biodiversity and climate crises and is therefore also best suited to securing the world's food supply and ecosystemic balance for future generations.

In order to make this model become a reality, the ECI sets forth three main demands addressed to the European Commission:

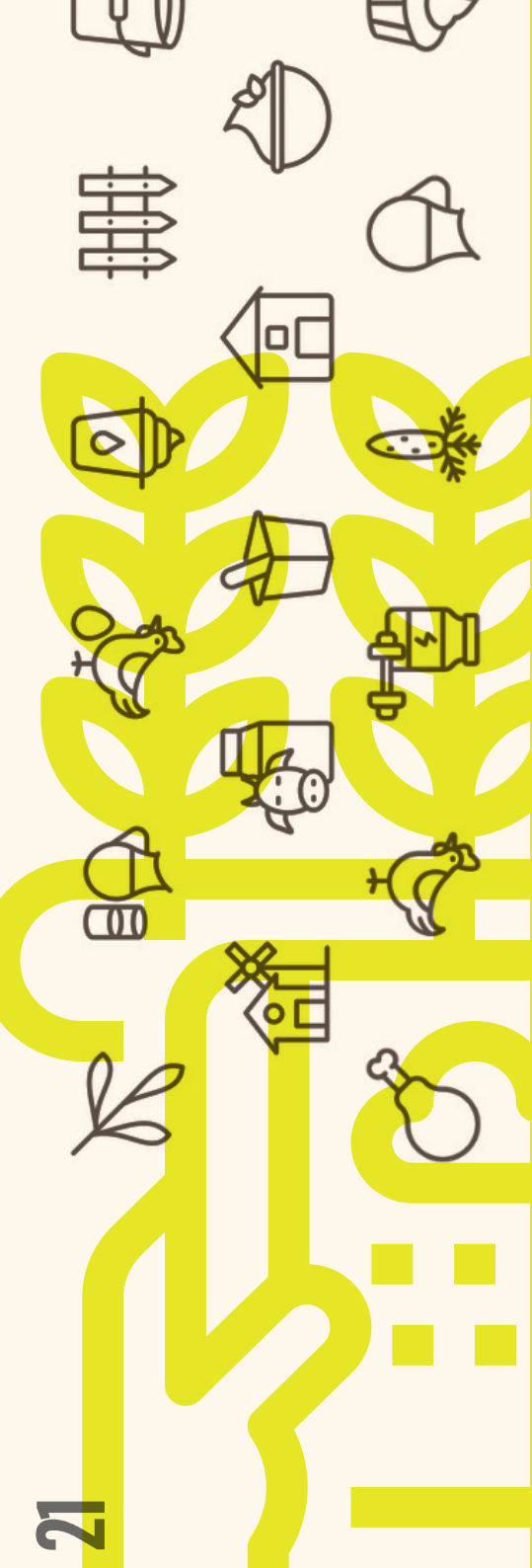
1. to phase-out synthetic pesticides entirely from EU agriculture by 2035;
2. to introduce measures to restore biodiversity in agricultural areas;
3. to introduce measures to support farmers in the transition towards agroecology.

Should the ECI be successful, the Commission will be legally bound to consider our demands and set forth legal acts for their implementation.

SAVE BEES AND FARMERS!

"I support the Pesticide Action Network Europe and the European Citizens' Initiative Save Bees and Farmers, because we need strong and loud NGOs fighting for a green future. We know that the our climate- and biodiversity crises will be worsen by the current CAP-Deal and undermines good initiatives from the commission like the Farm2fork Strategy. Thus we need PAN and others to help us raise the public pressure in our fight."

Thomas Waitz – MEP (Greens/EFA)
Co-Chair of the European Green Party,
Committee on Agriculture
and Rural Development



After many months of preparations and after receiving the green light from the European Commission, the Save Bees and Farmers! ECI was officially registered in September 2019. On this occasion, an [event](#) was organised on the Schuman round-about in Brussels (in front of the EU Commission and Council) and a hand-over of an ECI letter was passed on to a member of the cabinet of Phil Hogan (former EC Agriculture Commissioner). The ECI signature collection officially kicked off in November, collecting over 10% of total signatures in just ten days since its launch!

The Save Bees and Farmers! ECI alliance holds the vision of a European Union in which agriculture is a vector of people's well-being in terms of employment, health and biodiversity recovery. We wish to redevelop vibrant rural areas where small-scale farms provide decent employment while producing healthy food in balance with nature, enabling biodiversity to heal from the environmental disaster caused by the emission of agrochemicals on our land for decades.

*If you share our vision,
sign & share the ECI today at
www.savebeesandfarmers.eu*

PAN Europe's actions on bees

- + PAN Europe lobbied Member States to obtain a ban on the neonicotinoid thiacloprid, in a victory for EU pollinators.
- + PAN Europe and its members carried out active lobbying to obtain the implementation of the 2013 EFSA Bee Guidance Document, meeting the pesticide unit in DG SANTE as well as President Juncker's agricultural attaché. Despite the [European Parliament largely rejecting](#) the decision of non-implementation, and [voting a resolution](#) asking the Commission to do more to protect bees, unfortunately a majority of Member States kept opposing its implementation.
- + A significant part of the anti-neonicotinoids EU bee coalition have joined the ECI as well as PAN Europe members and the initiative allowed PAN to develop a collaboration with new strong European NGOs.
- + PAN Europe has been very active on the Pollinators initiative throughout the year, working with a series of MEPs to push for the finalisation of a resolution on the Pollinator initiative from DG ENVI before the closure of the legislature, actively exchanging with

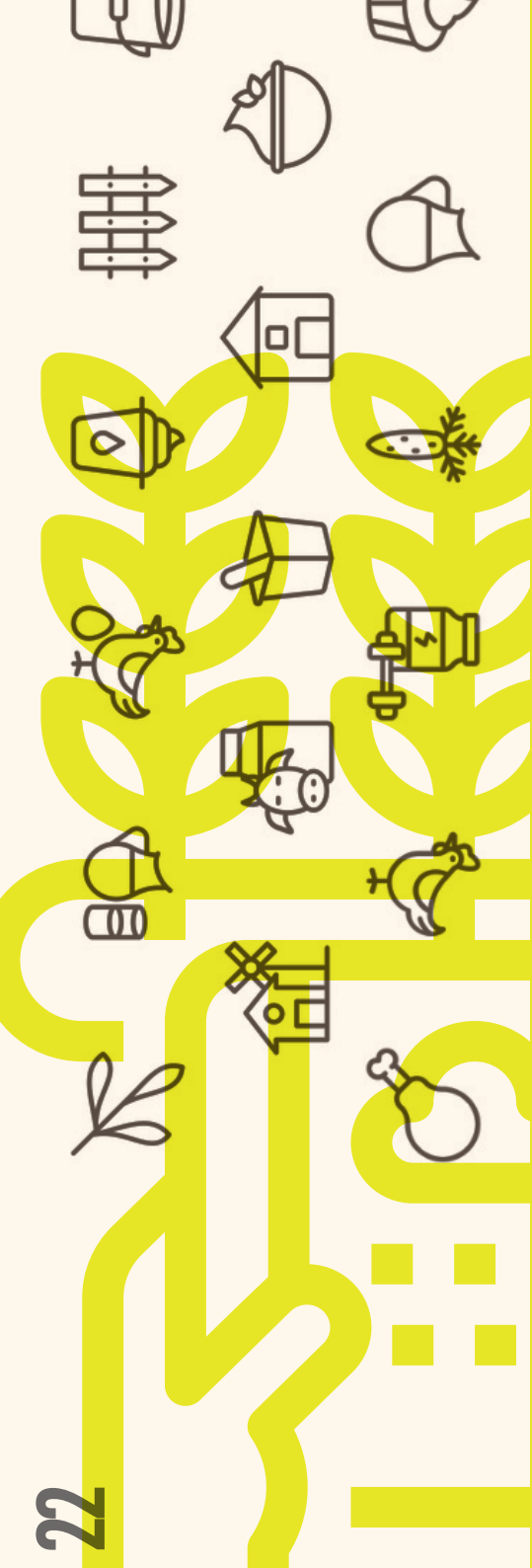
SAVE BEES AND FARMERS!

PAN Europe's actions on bees

“Sustainable agriculture is possible, which is why I invite you to sign the Save Bees and Farmers European Citizens’ Initiative. It is a fundamental instrument of participatory democracy that allows European citizens to take an active part in EU policy and to ask the European Commission to address issues we care about. We have already been able to achieve this in the past and we will succeed again!

I have signed, and you?”

Eleonora Evi – MEP
(Non-attached Members)
Committee on the Environment,
Public Health and Food Safety



DG ENVI to foster the production of a consistent report for the new EP legislature to vote on, and giving input to the Court of Auditors report on pollinators.

- + On derogations to neonicotinoids, we informed the Standing Committee on phytopharmaceuticals of our standpoints and have carried out targeted actions in Belgium jointly with our member Nature&Progrès Belgique. We sent an Access To Document request to the European Commission to investigate neonicotinoid derogations given to sugar beets in Belgium. We initiated a legal action at Belgian level to oppose to the sugar beet neonicotinoid derogation. Following a second derogation provided to Belgian farmers for 2020, we sent an access to document request to the Belgian competent authority in view of another legal action.

Highlights in 2019

- + The European Parliament vetoed a move by Member States and the European Commission to weaken EU rules protecting bee colonies from toxic pesticides (October 2019).
- + In a resolution adopted in December 2019, the European Parliament called on the EU executive Commission to beef up its Pollinators Initiative, saying EU-wide mandatory pesticide reduction targets are needed to halt the decline in species.
- + In July 2019, [EU Member States circumvented the EU ban on neonicotinoid pesticides](#) to protect bees by refusing to support a Commission implementing decision to stop Romania and Lithuania from continuing to abuse the derogation system by issuing, year after year, emergency authorisations for neonicotinoids.
- + Neonicotinoids and bees: Despite EU moratorium, INRA, CNRS and the Institut de l'Abeille [found](#) insecticides still detectable in staggering quantities
- + France [banned](#) two US pesticides containing sulfoxalor, citing risk to bees

SAVE BEES AND FARMERS!

Highlights in 2019

“Highly toxic pesticides kill many (wild) bees and contribute to the loss of biodiversity. While the EU prohibits the use of some of the most dangerous synthetic pesticides, it still allows their export to non-EU countries, in blatant disregard of the precautionary principle. We cannot repair this damage with money. Sustainable, stable ecosystems, that are not weakened or disturbed by pesticides, are the sensible solution. That’s why PAN Europe’s citizens’ initiative is all the more important: let’s save our bees and with them also our farmers, our planet and our society - NOW.”

Sarah Wiener – MEP (Greens/EFA)

Committee on Agriculture and Rural Development,
Committee on the Environment, Public Health and Food Safety,
Committee on the Internal Market and Consumer Protection

Pesticides are not only used in agriculture but also in the towns and cities. They are used in the green areas of schools, playgrounds, kindergartens, parks, private gardens, sports fields, sidewalks and cemeteries. While on one hand workers applying pesticides must wear protective clothing, on the other hand 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 percent of European citizens live in cities and citizens are increasingly concerned about the use of pesticides, showing there is a strong political and public interest to ban use of pesticides in public areas.

While many towns and cities in Europe are already pesticide-free as 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 becoming pesticide-free, or interested in doing so. Going pesticide-free not only helps to protect cities and towns' people and environment, it is also fundamental in the transition to becoming 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, to name a few. Towns making the effort to become pesticide-free represent 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 join the European Network of Pesticide Free Towns ([Pesticide-free-towns.info/towns-network](#)) and become pesticide-free. The network has continued expanding welcoming more committed cities and towns in Italy, Portugal, Spain Estonia and Croatia.

In June 2019, the European Committee of the Regions adopted an official opinion on the Commission's roadmap "Towards a comprehensive European Union framework on endocrine disruptors", criticizing the fact that no concrete

EU NETWORK OF PESTICIDE-FREE TOWNS

PAN Europe's actions on pesticide-free towns

"We joined the Pesticide Free Towns network because we believe that even in a territory as small as ours, maintaining a strong focus on the quality of environmental interventions is an element of community awareness."

Emanuele Rallo – Mayor of Oriolo Romano, Italy

"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

action plan or timetable to achieve progress in this area had been foreseen. As such, the rapporteur stressed the need for preventive action and local and regional representatives called on the European Commission to provide a higher level of protection from hazardous chemicals, highlighting some of the initiatives and concrete actions aimed at reducing exposure to endocrine disrupting chemicals, in order to protect in particular the most vulnerable groups in our society, that many [EDC-Free Europe partners have launched](#) over the years in partnership with local and regional authorities, including PAN Europe's "EU Network of Pesticide-free towns".

As part of its campaigning efforts for a ban on the use of pesticides in non-agricultural areas (both public and private), PAN Europe participated in the [Labbé Law colloquium](#) and Organic Cities Network Europe's Proposals of Organic Cities.

Highlights in 2019

- + Helped the citizens of Malles, Italy with outreach on their [study testing pesticides residues on playgrounds](#).
- + Helped citizens of the Veneto region, Italy, who are victims of pesticide spraying and drift due to the massive production of Prosecco wine in the region.

- + Continued helping our member organisation Marcia Stop Pesticidi by relaying citizens' concerns about health and environmental protection from pesticides in the Veneto region of Italy (providing advice especially on the topic of stopping pesticide spraying around homes and schools). For the third year in a row, in 2019 this collaboration culminated in the [3rd Marcia Stop Pesticidi March](#), which saw the participation of hundreds of people across 3 Italian regions.
- + [Supported](#) trying to block the Prosecco region from becoming a UNESCO heritage, as that would mean more people coming to the region for tourism in the future, and therefore more people being potentially sprayed
- + Took part in the [conference organised in Rome by Cambia la Terra](#) 'Liberi dai Pesticidi: l'Italia comincia dai Comuni', promoting and showcasing pesticide-free urban realities (June).
- + Participated in the "[No Pesticides on my Plate](#)" conference organised by Turkish member Bugday in Istanbul.

EU NETWORK OF PESTICIDE-FREE TOWNS

Highlights in 2019

"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 private gardens

Court cases and access to 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 Netherlands 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 2019, PAN Europe submitted a new complaint to the EU Ombudsman because the Commission did not follow through on its promise to the Ombudsman to reduce the confirmatory information derogations. The Ombudsman combined this complaint with the previous one and proceeded to asking Commission and EFSA for comment, allowing PAN Europe to comment on the comment. A verdict is expected in 2020.



COURT CASES, ACCESS TO JUSTICE & CONFLICT OF INTEREST

"Supporting the European Citizens' Initiative Save bees and farmers is essential because three quarters of food crops depend on pollination: the programmed disappearance of wild pollinators is an existential threat. But pesticide-free agriculture is possible. Biological control methods, using crop combinations, have already proven their effectiveness. It is urgent to make this agro-ecological transition, for the health of soils and plants, and for our own health."

Olivier De Schutter – former UN Special Rapporteur on the Right to Food
Co-Chair of the International Panel of Experts

Regarding access to court, based on the negative response PAN Europe received from the European Court of Justice in 2019, the Aarhus compliance committee decided that the rules are badly implemented by the European Commission, and asked the European Commission to align its legislation with the Aarhus convention. PAN Europe actively contributed to the development of a report on the implementation of the Aarhus regulation by the European Commission⁴. PAN Europe also had successful court cases on access to documents in 2019.

As a follow-up to the results of the successful 'Stop Glyphosate' European Citizens' Initiative, it was decided that toxicity studies from pesticides application dossiers will be opened up, and are expected to be made available in March 2021.

In 2019, new court cases were initiated at national levels. PAN Europe started court cases in the Netherlands on pesticide combination toxicity, on formulations that are not tested and on comparative risk assessment. Another Dutch case was initiated to challenge the authorisation of a pesticide containing a bee-toxic insecticide, Sulfoxaflor. The authorisation

was based on an outdated guidance document from 2002 while a newer version from 2013, that is more protective to bees, was available. A court case was launched at Belgian level to question the provision of derogations for the use of banned neonicotinoids on sugar beets.

PAN Europe has kept supporting the European Commission in the appeal case from Bayer against the restrictions on the use of neonicotinoids on bee-attractive crops in 2013. The hearing and verdict are expected in 2020.

Conflict of interest

The risk assessment of and decision-making on chemicals in the European Union have to be based on current scientific and technical knowledge. This rule must be respected particularly during the implementation of the EU Regulations by the European Commission in the final decision taking, as is the case for 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 European law mandates and what people expect from regulators; therefore, this is what the EU Commission should deliver.



COURT CASES, ACCESS TO JUSTICE & CONFLICT OF INTEREST

“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

⁴ <https://www.milieu.be/study-on-the-eu-implementation-of-the-aarhus-convention/>

Nevertheless, for several risk assessment methodologies (the criteria and (test) methods that are the basis for decision-making) it has been demonstrated that science can be twisted and turned. Industry lobby organizations as well as industry-linked experts have managed to impose their views regarding risk assessment, influencing European risk assessment on food, as revealed by PAN Europe in the past.

In May 2019, thanks to the disclosure of a haul of over 600 secret documents that PAN Europe managed to obtain after a two-year legal battle, top EU officials were found trying to protect chemicals and farming interests from incoming EU rules that were expected to directly ban up to 32 endocrine disrupting pesticides. The secret papers, released by order of European Court of Justice, show an internal struggle to define scientific criteria for identifying and banning EDC pesticides. Outnumbered environment and research department officials are seen resisting attempts by agriculture, enterprise, industry and even health department officials to water down the criteria by introducing non-scientific factors, such as farming profitability.



COURT CASES, ACCESS TO JUSTICE & CONFLICT OF INTEREST

“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 (2014-2019)
Co-rapporteur for the PEST Committee on the EU pesticide authorisation procedure

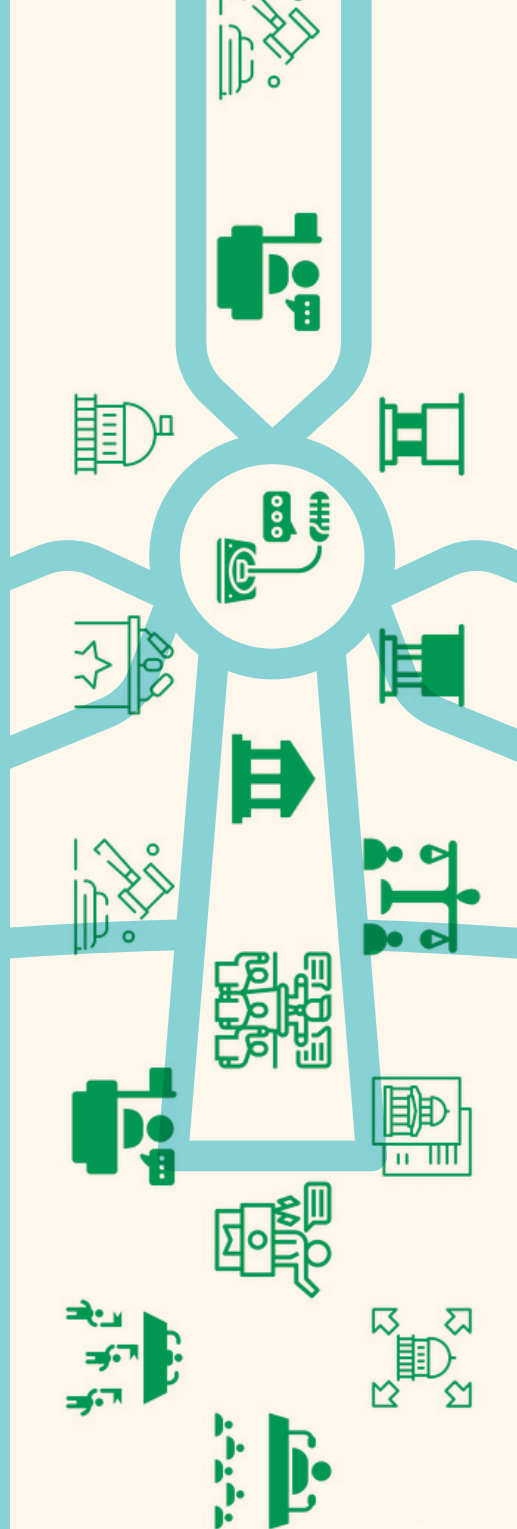
In 2019, PAN Europe is proud to have contributed to:

- + **Protecting the hazard-based approach of the pesticide risk assessment procedure**, setting aside introduction of socioeconomic elements

The hazard-based approach in pesticide regulation is now a top priority in the political agenda of EU institutions, and the importance to implement the Precautionary principle and PPPR has been highlighted.

- + **Reducing derogations** by Member States
- + The Commission has started taking measures against the abuse of derogations in Member States (e.g. emergency use), as was famously the [case](#) of Romania and Lithuania.

- + **Establishing serious data requirements** with further testing in the EU chemicals assessments
- The lack of testing in chemicals assessment and the need to develop new test methods and implement fully the current ones to fill in the gaps of knowledge in relation to endocrine disruptors (EDCs) are now among the goals committed to by the new European Commission (eg fitness check of EDCs).



- + **Achieving pesticide taxation** in Germany, France, Belgium, Czech Republic, Estonia, and Sweden
- + Pushing the European Commission to **release, for the first time ever, information about pesticide use statistics** across Europe (crucial for proper implementation of the SUD).
- + Pushing the European Commission to enforce SUD implementation more firmly.

Biodiversity

Reducing pesticide dependency is vital for the protection of biodiversity. Industrial agriculture has been identified as a major driver of biodiversity loss. Pesticides are a cornerstone of intensive food production and their use has a major effect on biological diversity, alongside habitat loss and climate change. They can have short-term toxic effects on directly exposed organisms, and long-term effects can result from changes to the food chain or food resources. Policy intervention and greater coherence are urgently needed!

OTHER WORK AREAS / WORK RESULTS OF RELEVANCE IN 2019

Biodiversity

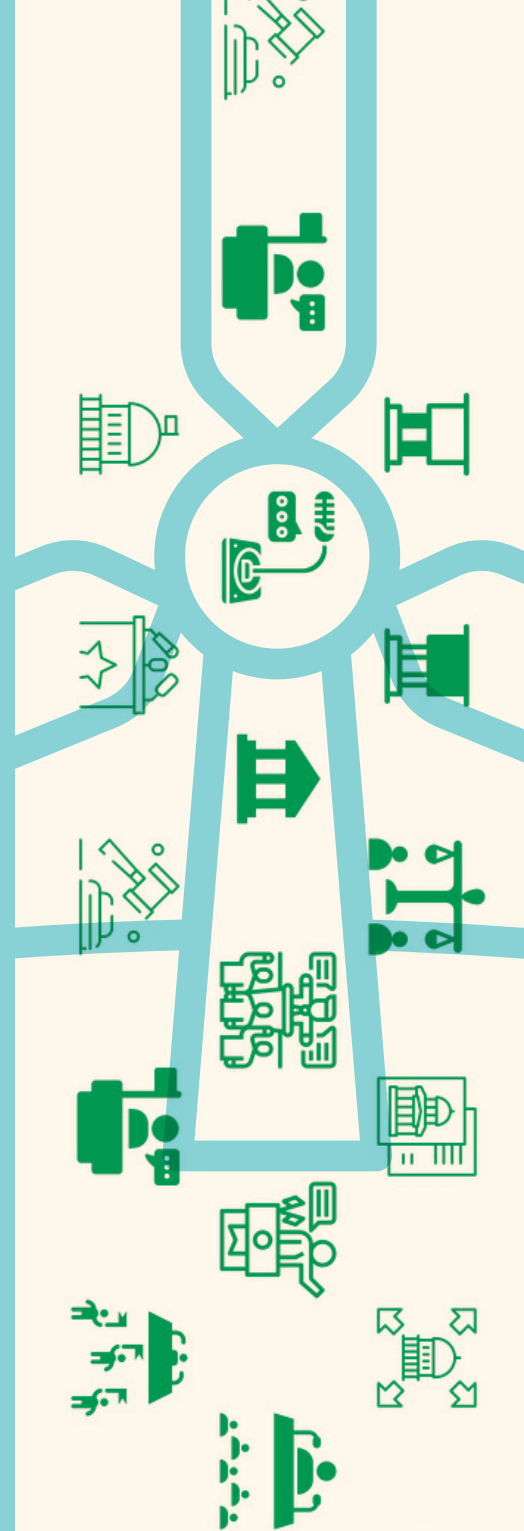
“Here in Ozalji we are convinced that managing urban green spaces without the use of chemistry is not a utopia. That is why we have joined the European Pesticide Free Towns network. Belonging to a European network is very important to spread this message to the rest of Croatia and the whole of Europe.”

Gordana Lipšinić – Mayor of the pesticide-free town of Ozalji, Croatia

In 2019, PAN Europe:

- + Worked together with scientists to develop a position on how to improve environmental risk assessment for pesticides, reaching out to DG SANTE, meeting with civil servants, and giving suggestions of independent experts involved.
- + Conducted an investigation and wrote a position paper on Specific Protection Goals (SPGs) for pesticides released in the environment and work of EFSA on ecosystem services, raising concerns on the involvement of industry in the process.
- + Effectively brought the voice of civil society in the ongoing discussions with the DG SANTE, EFSA and the Member States on the improvement of pesticide environmental risk assessment and the impact of pesticides on ecosystems. This work will continue in 2020.

The work of PAN Europe and other civil society organisations in 2019 significantly contributed to making the protection of biodiversity a high priority in the political agenda, as was confirmed in the [European Green Deal](#) published by the new Commission, which recognises the impact of pesticides on water and soil.



This impact will be particularly addressed under the EU Green Deal's Biodiversity strategy 2030 and "zero pollution action plan for water, air and soil".

Highlights in 2019

- + PAN Europe [contributed](#) to the European Commission consultation on its EU 2030 Biodiversity Strategy, which was published in early 2020 setting forth highly ambitious targets.
- + In May 2019, PAN Europe organised the highly successful conference '[Pesticides, biodiversity loss and agronomic solutions](#)' that gathered academics, scientific and policy experts as well as members of the European Commission.

Water

Protecting and maintaining pristine the conditions of our bodies of water from pesticides is crucial, as these can easily be contaminated by pesticides through leeching, spray drift, seepage and runoff, causing serious human health and environmental damage. That is why PAN Europe has maintained the protection of water a high priority in its work in 2019.

OTHER WORK AREAS / WORK RESULTS OF RELEVANCE IN 2019

Highlights in 2019

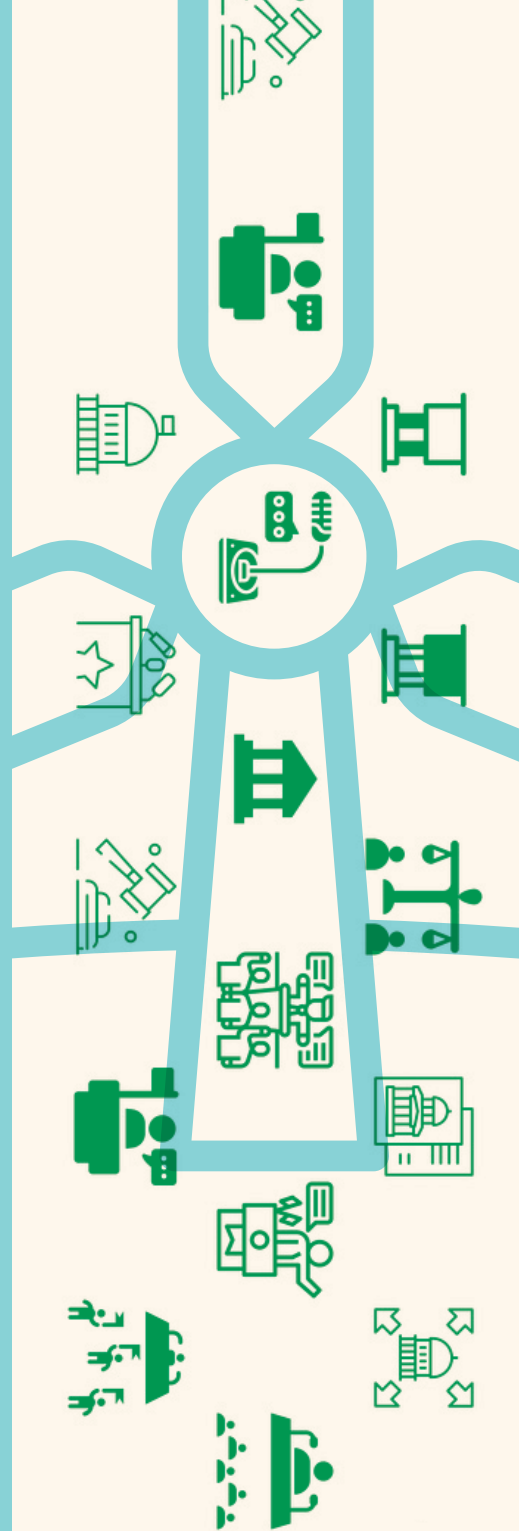
Water

"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."

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*

The work of PAN Europe in 2019 contributed significantly to highlighting the need to implement the [Water Framework Directive](#) (WFD, 2000/60/EC) for European water bodies to achieve good ecological status. PAN Europe succeeded in highlighting the need to address the impact of pesticides on European water resources at political level, which was reflected in the [fitness check of WFD](#) (where our contribution was specifically mentioned) and discussions on the revision of the Drinking Water Directive (DWD).

PAN Europe also contributed to the full and rigorous implementation of the WFD by providing clear targets, guidelines and standards to reduce the presence of harmful pesticides and to achieve a good ecological status in all European water bodies, also tackling the aquatic contamination by endocrine disrupting pesticides.



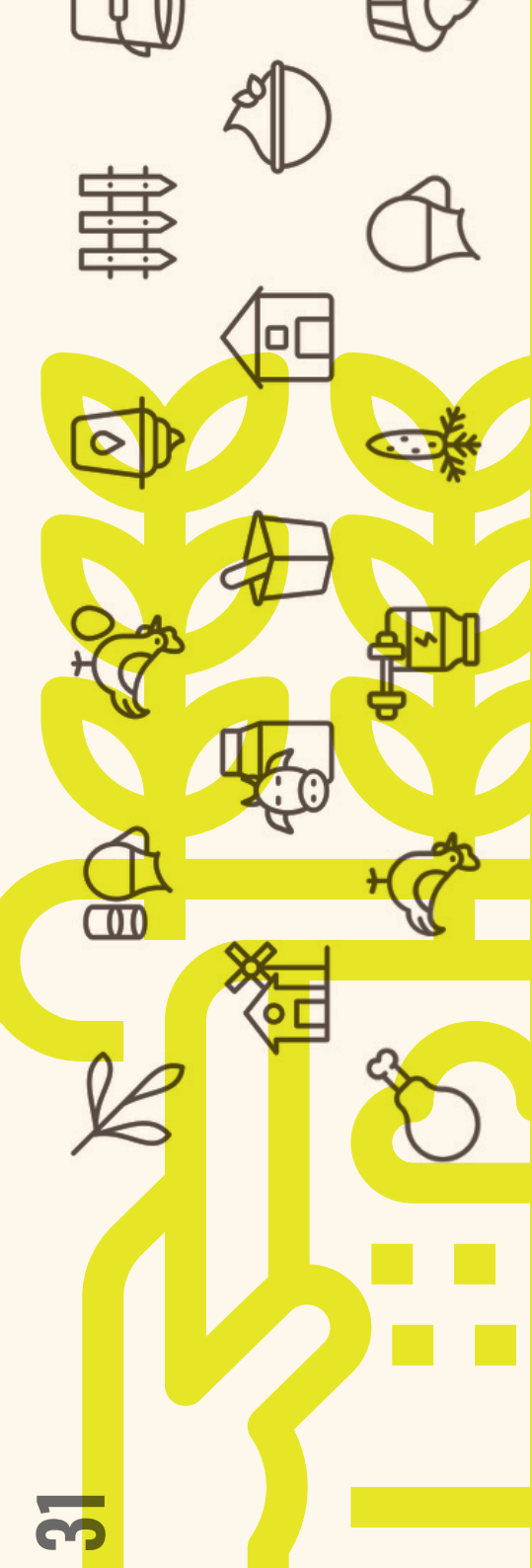
As a result, the fitness check conclusions indicated that the directive is fit for purpose and was an important tool for Member States to enforce its implementation. We were successful in obtaining high standards of protection from pesticide (including EDCs) contamination in drinking water, as a strict threshold was set both for individual pesticides and mixtures.

Moreover, PAN Europe addressed the need to have coherent implementation of environmental protection from pesticides across all legislative sectors, integration the objectives of the PPPR, the WFD, and the DWD. This is now addressed in the European Commission's European Green Deal.

OTHER WORK AREAS / WORK RESULTS OF RELEVANCE IN 2019

"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 – Farmer, Schwerin, Germany



How is PAN Europe financed

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Find the full list of PAN Europe's members [here](#).

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 46 member organisations. In 2019, we further expanded our network welcoming new members from Turkey, Spain, Italy, France and the EU level.

“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

INSIDE PAN EUROPE



How is PAN Europe financed

Organisational development with and for our members

“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

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Pesticide
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