



**Pesticide
Action
Network**
Europe

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Brussels, 21 December 2017

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

Dear Minister,

Pesticide Action Network (PAN) Europe and its members are following closely the implementation of the Directive 2009/128/EU on Sustainable Use of Pesticides (SUD); we are therefore pleased that DG SANTE has published its [evaluation report](#). We are also pleased to notice that you, as part of the roundtable held in the EU Council on agriculture (on 6 November 2017), confirmed engagement towards ensuring serious implementation in the future.

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

PAN Europe's [Evaluation of the National Action Plans](#) (NAPs) from 2013 clearly shows that, while the majority of Member States are using the National Action Plans (NAPs) to gather information on pesticide use in their country, not much progress was originally made.

After the publication of DG SANTE's evaluation report we prepared [PAN Europe's evaluation report](#), in which we look at the uptake of actions since the NAPs were prepared in 2011-2012. Our analysis shows that progress has been made in the field of checks on spraying equipment, and in the development of training courses and certification schemes regarding how best to spray pesticides. Instead, very little progress has been made in promoting the uptake of alternative techniques, which

are the key to ensuring serious pesticide dependency reductions. We therefore conclude that the main achievements since the SUD was adopted are decisions in Netherlands, France, Luxembourg and Belgium to stop using pesticides in public areas as of 2017-18.

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

We call on each Member State to revise their NAP as follows:

- ✓ **Serious targets and timetables:** We call on Member States to set quantitative reduction targets of 50% to be obtained in 10 years in the agricultural sector, following the model from France, and if needed accompanying this with the establishment of a pesticide tax, as has been done with great success in Denmark. Also, we call for that [towns are made pesticide free](#), a growing tendency already done in a number of central European Member States.
- ✓ **Serious measures to protect the aquatic environment and drinking water, with mandatory establishment of buffer zones.** [42% of the EU's freshwater](#) ecosystems suffer from chronic toxicity. Pesticides banned decades ago, such as atrazine, a reprotoxic and endocrine disrupting herbicide, keep reappearing. We call on Member States to take the pollution of water from pesticides serious, and to target this specific in the revised NAP.
- ✓ **The revised NAP to develop a strategic pollinator plan - protecting bees and pollinators:** While not explicitly mentioned in the SUD, it has now become [increasingly recognized](#) that pesticides, mainly insecticides but also fungicides, have a broad range of lethal and sublethal effects on pollinators under controlled experimental conditions as well as at field level.

The EU has recently kicked off an [EU pollinator strategy](#). It is more than time to become coherent and stop providing article 53 derogations for emergency authorisations and promote nature-based solutions instead, starting with the establishment of flowering buffer strips in the field attracting not only pollinators but also natural predators to manage pests; we invite you to [watch some of the films](#) that we have produced with farmers' testimonies as to how this can be done.
- ✓ **The revised NAP to develop a strategic plan on soil protection:** the Estonian presidency has put the debate on soil back on the [EU agenda](#). As recent studies show that 45% of Europe's top soil contains glyphosate residues. We call on Member States to include soil health into the debate about the revised NAP.
- ✓ **Develop good EU pesticide dependency indicators:** since 2011, Eurostat has been publishing data annually on [EU sale of pesticides](#).

In order to ensure monitoring on quantifiable pesticide use dependency, we must build on article 67 of EU Regulation 1107/2009 on the marketing and sale of plant protection products in which farmers are required to keep report of products used. We call on member states to make sure these statistics are being collected at farm level and forwarded to Eurostat allowing them to ensure publication of sector-specific pesticide use data. We call for a revision of EU Regulation (EC) No 1185/2009 concerning statistics on pesticides to make sure that more information on specific substances is released in the EU, fulfilling obligation with regards to citizens' right to know.

- ✓ **Stakeholder participation in the revision of the NAP:** we finally call on Member States to make sure that the revised National Action Plan will be prepared soon, that environmental and public health groups are involved in the preparation of the revised NAP and that new plans are published in early 2018.

We noticed that you in the round table debate in Council in late November, highlighted the importance *'training and professional consulting to ensure up-to-date knowledge, and the importance to focus on integrated pest management, to disseminate proper information in order to inform about the risks linked with the use of pesticides, to adequately test the equipment and allocate efficient resources for research and for the development of an integrated and sustainable strategy of pest management.*

We are therefore pleased to inform you that PAN Europe in collaboration with International Organisation for Biological Control (IOBC) and International Biocontrol Manufacturer Association (IBMA) are working together to promote Integrated Pest Management (IPM) tools, and that we beyond the films mentioned above, also we have developed a joint exhibition illustrating IPM strategies in 11 posters, we would be very pleased if you would consider exposing this within your promises to enlarge the ministerial debate on IPM. Also, each year we are again in collaboration with IBMA and IOBC organising a symposium on uptake of IPM. The [next symposium](#) is focused on discussing alternatives in arable crops, and will be held in Brussels on 31 January 2018, and as web-streaming is foreseen, it would be wonderful if this could also help to stimulate the debate on IPM uptake in the Irish arable farming sector.

Finally, in the entire debate on pesticide use and economics, we recall that the importance of moving away from a debate based on yields and short-term income and towards a system based more on income, both in the shorter and longer run. Also important to recall [the many nature based solutions](#) already being applied in some places of Europe allowing both biodiversity and farmers profitability to increase at the same time. We call on Member States to think this all into the reflections of the reform of the Common Agricultural Policy reform discussions. Today some of the Member States having the highest per hectare payments are according to [PAN Europe calculations](#) also the one using most pesticides per hectares, and the [current CAP is not delivering on pesticide use reductions](#). As the CAP Communication is focused on result based approaches: PAN Europe calls for that pesticide dependency reductions becomes one of the result indicators, and that the SUD and the CAP debate is becoming much more interactive. Some thoughts on how to do this see [PAN Europe evaluation report](#).

Thank you in advance for your consideration of these points, which we of course would be very interesting in discussing with you in more details.

Yours sincerely,



Francois Veillerette
President of PAN Europe