



Mr Frans Timmermans
Executive vice president of the European Commission
EU Green Deal
European Commission
B-1049 Brussels

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Open letter: Pesticide Action Network Europe's reaction to the EU Green Deal

Dear Commissioner Timmermans,

Pesticide Action Network Europe (PAN Europe) would like to congratulate the incoming European Commission for the publication of the EU Green Deal (EGD). We welcome the changing approach away from short term 7 years budget period reflections towards instead building up a roadmap enabling European citizens and businesses to benefit from sustainable green transition.

It is a relief that the incoming European Commission has the political will to start thinking long term – towards 2050 – in the spirit of the EU having the collective ability to transform its economy and society to put it on a more sustainable path', and that you are willing to use your next five years in office to develop three key communications namely the Farm to Fork, the biodiversity strategy by 2030, and the zero-pollution strategy while start revising current EU policies and EU laws and to make sure they start to contribute to the objectives of the EGD.

However, when reading carefully the EGD in relation to translating the European model of farming in this approach the picture gets less clear. This is why PAN Europe would like to share with you our vision for EU's model of agriculture, seen from a pesticide perspective.

Chemical pesticides were introduced after World War II, allowing for a massive, rapid increase in global food and feed production. In the EU, this has engendered a model of farming that is too reliant on the intensive use of pesticides^{i,ii}, resulting in European farmers being locked in a pesticide-dependent system that puts them at a disadvantage.

This 'high-input, productivist paradigm' has reached its limit. Farmers are incentivised by policy and economic forces to produce ever-more, with disastrous impacts on our water sources, soils, biodiversity, and climate, while more and more citizens, having become aware of the dangers related to pesticides, are asking for change.

The IDDRI study from 2018 '*An agro-ecological Europe in 2050: multifunctional agriculture for healthy eating*' based on the so-called Ten Years For Agroecology (TYFA) scenario addresses the challenges of sustainable food for Europeans: the preservation of biodiversity and natural resources and the fight against climate change require a profound transition of our agricultural and food system. An agro-ecological project based on the phasing-out of pesticides

and synthetic fertilizers, and the redeployment of extensive grasslands and landscape infrastructure would allow these issues to be addressed in a coherent manner.

Another interesting study ‘The economic potential of agroecology: Empirical evidence from Europe’ⁱⁱⁱ shows that another farming model is possible but that it would need development of new (more circular) markets.

The EGD mentions: *“It takes 25 years – a generation – to transform an industrial sector and all the value chains. To be ready in 2050, decisions and actions need to be taken in the next five years”*. IDDRI indeed confirmed: *“achieving an agro-ecological Europe by 2050 means taking action now. In this context, the next 10 years will be critical in terms of engaging Europe in a real agro-ecological transition”*.

The topic of pesticides clearly illustrates the lacking agro-ecological transition so far. The fact that agronomy is key in the management of pests is not new – it was already highlighted by the international Organisation for Biological Control in the 1950s. However, the concept is still not integrated into EU policies. For instance, in the EU pesticides authorisation process, there are no clear links between an authorisation and existing alternatives, meaning that within the current EU law an active substance is being (re)-approved despite the presence of different non-chemical or less toxic alternatives. This system is structured under a chemicals logic, while the discussion rarely touches on the preventative agronomic practices that could help prevent pests from establishing/spreading (ex. cover crops, crop rotations), and that could encourage the transition from killing pests to managing pests (ex. buffer strips). Once an active substance is banned, the structure of the Common Agricultural Policy (CAP) does not allow Member States to offer financial support to directly compensate farmers for introducing these bans. The lacking interaction between EU pesticide regulations and the CAP means that EU pesticide policy remains a debate on replacing one chemical with another, rather than encouraging an exchange on how to replace one chemical with a preventative agronomic practice or alternative treatment methods. It gets even more depressing that the EU has still not managed to integrate the EU Directive on Sustainable Use of Pesticides into the CAP, and when doing so in the CAP reform proposals the link to the most relevant article (article 14 on farmers need to uptake on integrated pest management as from 2014) has been left out.

In 2016, PAN Europe and other civil society organisations launched a European Citizen Initiative (ECI) ‘Ban Glyphosate and Protect People and the Environment from Toxic Pesticides’. 1,3 million Europeans signed the ECI in less than four months.

This year, PAN Europe and other organisations launched the ‘Save Bees and Farmers’ ECI, calling for agriculture in the entire Union to be free of synthetic pesticides by 2035. The old logic of simply substituting a hazardous chemical with another must be replaced by one giving clear targets and timetables to reduce farmers’ dependency on chemical pesticides instead. Since its launch on 25 November, the ECI has obtained more than 125,000 EU citizens’ signatures – giving us reason to believe we are not alone in holding this vision.

We thus encourage the European Commission to start reflecting on how to phase out synthetic pesticides and other chemicals used in the agricultural sector within 10-15 years as that could a major element in obtaining the ecological transition. The transition should remove obstacles and provide incentives to change.

We call on the European Commission to:

- Set overall use and risk EU wide reduction targets of 80% by 2030 and integrate these not only the white paper on Farm to Fork as proposed in the EDG, but also into the EU biodiversity strategy 2030, the zero-pollution ambition, as well as into the EU Directive on Sustainable Use of Pesticides and EUs Common Agricultural Policy.
- Update the CAP reform proposals giving increased attention to the use of agronomic practices to build soil fertility and manage pests, as a minimum explained in PAN Europe position papers^{iv}, while starting to reflect on the potential of pesticides taxation.
- Recognising that to develop another model of farming the concept of diversification and the market potential of agro-ecology needs to get main attention in future communications relating to the circular economy, and as part of that also start building up database with key statistics, prepare updated market forecasts that take into accounts the different model of production^v.

While we do agree with the argument from the EGD that ‘*The EU has the collective ability to transform its economy and society to put it on a more sustainable path*’ we do recall that the CAP, over almost 30 years since the introduction of a limited environmental dimension, has delivered little in terms of the improvement of the related environmental media, and will need radical change of polluter pay principles, not only because Europe ‘should do more’ to improve biodiversity, water quality and soil show currently showing an ever increasing negative trends but mainly because the European Commission in its role as guardian of the Treaty simply needs to make sure that environmental and public health EU legislation is being implemented.

We would gladly welcome the opportunity to discuss the above with you in more detail.

Sincerely yours,



Francois Veillerette
PAN Europe President

ⁱ Jacquet, F., Butault, J. P. & Guichard, L. An economic analysis of the possibility of reducing pesticides in French field crops. *Ecol. Econ.* **70**, 1638–1648 (2011), <https://doi.org/10.1016/j.ecolecon.2011.04.003>

ⁱⁱ Lechenet, M., Dessaint, F., Py, G. *et al.* Reducing pesticide use while preserving crop productivity and profitability on arable farms. *Nature Plants* **3**, 17008 (2017) doi:10.1038/nplants.2017.8

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

^{iv} <https://www.low-impact-farming.info/cap-eu-policies>

^v Since at least two years PAN Europe is calling on the European Commission, DG Agriculture to at least start presenting market forecasts that distinguish between organic and conventional agriculture. But even that DG AGRI says is too difficult!