



Virginijus Sinkevičius
European Commissioner for Environment, Oceans and Fisheries
European Commission
B-1049 Brussels

Brussels 15 June 2021

Open letter: The importance of making pesticide use one of the indicators in the Green City Accord

Dear Commissioner Sinkevičius,

Pesticide Action Network (PAN) Europe is a Brussels based NGO working with its 45 national members to replace hazardous pesticides with sustainable, non-chemical alternatives. We are writing to you in all urgency regarding tomorrow's workshop on the indicators for the European Green City Accord (GCA).

In your reply to PAN Europe on 6 May, it is mentioned that: *The Green City Accord is a pilot initiative. We are currently testing whether it can stimulate local uptake in conservation and enhancement of urban biodiversity by increasing the quality of green areas in cities and by halting the loss of and restoring urban ecosystems. Eliminating the use of pesticides and limiting management practices harmful to biodiversity in urban green areas is among the measures proposed.*

We are pleased that the GCA's political commitment mentions the elimination of pesticides, however, we call on you to match this by adding a specific pesticide use GCA indicator. Here is why it is important:

[Regulation EC \(No\) 1185/2009](#) concerning statistics on pesticides made it mandatory for Member States (article 3) to send pesticide sale statistics to the European Commission each year and pesticides use statistics every five years. The European Commission's report ([COM 2017\) 109](#)) evaluating the implementation of this regulation, among others notes: *Pesticide sales data provides a good quality estimate of the total quantity of pesticide products placed on the market on a national basis. It can show trends in new types of pesticides, quantities of products over time, and the subsequent risks for people and the environment. Such estimates could be improved in future by distinguishing between professional and 'home & garden' authorisations (i.e. for agricultural and non-agricultural purposes, respectively).*

According to the same report, the European Commission undertook a pilot project looking at how the Member States collect pesticide data from different public areas. This is what they conclude: *Besides the apparent diversity of national or regional situations, certain major actors are common to all Member States and should be the basis for all surveys on the use of pesticides in the non-agricultural sectors. These are: residential areas (including home & gardening); public areas (including golf courses); industrial areas; infrastructure; forest. These sectors of activity should be covered as a priority and should be the basis for*

comparing statistics on non-agricultural pesticide uses between the Member States or regions.

The regulation in question is currently being revised, and as part of that, it is being proposed that pesticide statistics from now be split between agricultural and non-agricultural areas. However, the European Commission at the same time is proposing a new overall statistical framework, Statistics for Agricultural Input and Output (SAIO) repealing Regulation EU (No) 1185/2009. Eurostat has recently informed PAN Europe by mail that, with the introduction of SAIO, all pesticide statistics relating to pesticide use in non-agricultural areas will no longer be collected at the EU level.

At the same time, several member states across Europe, including Belgium, France, Netherlands, Luxembourg, and most recently also Denmark and Sweden have decided to make their towns pesticides free while many others have joined [PAN Europe network of pesticide free towns](#). Each one of them should be collecting pesticide use statistics already, see for instance these statistics from [Flanders](#) and [Denmark](#).

We, therefore, call on you to make sure that a specific GCA indicator relating to pesticide use in public areas is added. Doing so will not only be in line with the European Commission's conclusion mentioned above but is also key to monitor the objective set in the European Biodiversity Strategy regarding the elimination of pesticide use in public areas by 2030.

We are at your disposal to provide supplementary information.

Sincerely yours,



Francois Veillerette
PAN Europe President