

Brussels, 21 December 2023

**To:**

**Minister David Clarinval**, Deputy Prime Minister and Minister for the Middle Classes, the Self-Employed, SMEs and Agriculture, Institutional Reforms and Democratic Renewal

**Minister Zakia Khattabi**, Minister of the Climate, the Environment, Sustainable Development and Green Deal

**Minister Frank Vandenbroucke**, Deputy Prime Minister and Minister of Social Affairs and Public Health

**Cc:**

**Prime Minister of Belgium, Alexander De Croo**

**Minister Hadja Lahbib**, Minister of Foreign Affairs, European Affairs and Foreign Trade and the Federal Cultural Institutions

**Subject: European Commission proposal for a Regulation on the Sustainable Use of Plant Protection Products (SUR)**

Dear Minister Clarinval,

Dear Minister Khattabi,

Dear Minister Vandenbroucke,

Ahead of the start of the Belgian presidency of the Council of Europe, we, 27 Belgian organisations, are writing you to ask you **to ensure that the important provisions of the Sustainable Use of Plant Protection Products Regulation (SUR) proposal are maintained, in order to protect the health of citizens and the environment, while ensuring a transition of EU agriculture towards sustainable and resilient practices.** The SUR proposal is essential for reducing the use and risk of pesticides in the EU. **The impacts of pesticides represent major social costs<sup>1</sup>**, linked to health problems, loss of biodiversity and ecosystem services (pollination, natural pest control, etc.), water and soil pollution and negative consequences for the long-term profitability and sustainability of agriculture. All citizens are at risk of negative health effects linked to pesticide exposure, with farmers and farmworkers, children, the unborn, pregnant women, the elderly and citizens with health problems being particularly vulnerable. **It is an important task of governments to protect citizens, biodiversity, ecosystems and ecosystem services from the harmful impacts of pesticides. An effective, meaningful SUR is urgent to address these serious challenges and ensure a transition to sustainable and robust agricultural systems.**

**Citizens clearly expressed their views on pesticide use on numerous occasions and on various platforms:** in a recent IPSOS [poll](#) on the public opinion on pesticide use in the EU, the

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<sup>1</sup> One study found that the annual cost of biodiversity loss from intensive agriculture in Germany was **€50 billion EUR** - far exceeding the potential cost of implementing the necessary legislation to protect and restore biodiversity. Another [study](#) estimated that the social costs of pesticide use in France represent more than 10% of the 2017 annual budget of the French Ministry of Agriculture and Food. A [study](#) by BASIC shows that the costs directly attributable to pesticides and borne by our society are twice the net profit for the industry.

Save Bees and Farmers ECI where Belgians were, proportionally, the second most represented country in terms of signature number, EU barometers and the Conference on the Future of Europe.

**Scientists continuously warn politicians about the alarming collapse of biodiversity, the detrimental impact of pesticides on biodiversity, ecosystem services and long-term food security, and the urgent need of a strong SUR<sup>2,3,4,5,6</sup>.**

Citizens are exposed to pesticides through different exposure routes (inhalation outdoors and indoors, ingestion, dermal absorption). Pesticides drift and migrate by air and water over distances of several kilometres and more. The residues are found on playgrounds, in and around kindergartens, schools, public buildings and houses, nature reserves, and in soils, water resources, animals and humans. A growing amount of scientific studies show the evidence on the links between exposure to pesticides and occurrence of disorders and diseases. Links have been established between exposure to pesticides and the occurrence of cancers (e.g. non-Hodgkin lymphoma, multiple myeloma, skin melanoma, ovarian, breast, brain, lip and prostate cancers) and neurodegenerative disorders (Parkinson's disease, Alzheimer's disease). Particularly vulnerable are **women, children and unborn**, with pesticide exposure related to disturbances of the reproductive system<sup>7,8</sup>, fertility disorders as well as neurodevelopmental alterations in newborns. Even low levels of pesticide exposure can interfere with the neurological and behavioural development of children (neonatal reflexes, psychomotor and mental development and attention-deficit hyperactivity disorder)<sup>9</sup>. Pesticide exposure also is associated with risks for male fertility. **Farmers, farmworkers and inhabitants of agricultural areas are also at particular risk of adverse health impacts by pesticides<sup>10,11</sup>**, with data showing higher concentrations of pesticides in their blood and increased genotoxicity.

Because of the above, it is of utmost importance to protect the health of citizens and ecosystems. We prepared science-based recommendations for an effective SUR in Annex I to this letter, which we kindly ask you to take into account. We urge you to stand firm in preserving a strong definition of the provisions analysed in Annex I, which are minimum requirements for providing better protection of citizens' health and the environment from exposure to pesticides, as repeatedly requested by EU citizens.

We appreciate your attention to this matter.

Thank you very much for your time and consideration,

Yours sincerely,

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<sup>2</sup> Candel, Jeroen: Scientists call for ambitious Sustainable Use of Pesticides Regulation

<sup>3</sup> Pe'er, Guy: Scientists support the EU's Green Deal and reject the unjustified argumentation against the Sustainable Use Regulation and the Nature Restoration Law

<sup>4</sup> Hallmann et al., 2017. More than 75 percent decline over 27 years in total flying insect biomass in protected areas

<sup>5</sup> Rigal et al., 2023. Farmland practices are driving bird population decline across Europe

<sup>6</sup> Brühl et al., 2021. Direct pesticide exposure of insects in nature conservation areas in Germany






<sup>7</sup> Bretveld et al., 2006. Pesticide exposure: the hormonal function of the female reproductive system disrupted?






<sup>8</sup> Farr et al., 2004. Pesticide use and menstrual cycle characteristics among premenopausal women in the Agricultural Health Study,

<sup>9</sup> Liu et al., 2012. Pesticide exposure and child neurodevelopment: summary and implications

<sup>10</sup> Figueiredo et al., 2019. Spatio-temporal variation of outdoor and indoor pesticide air concentrations in homes near agricultural fields


<sup>11</sup> Dereumeaux et al., 2020. Pesticide exposures for residents living close to agricultural lands: A review

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Annex 1 - Provisions of the SUR file recommended to be opened and discussed:

- 1. Binding Integrated Pest Management (IPM) with crop-specific rules:** Practice has shown that IPM is not taken up without a clear, directly legally binding framework. Despite the obligation for Member States to apply IPM under the current Sustainable Use of Pesticides Directive (SUD) since 2014, the uptake of IPM has not been achieved. Weakening the proposal by changing binding crop-specific rules into guidelines, would hence nullify a crucial provision of the SUR proposal. Effective and enforceable IPM with crop-specific rules are a prerequisite for the SUR to deliver effective changes in agricultural practices. Establishing a legally binding framework is essential to ensure a fair and equitable environment, compelling all Member States to contribute to a sustainable future for their farmers, safeguard the health of farmers and other citizens, and protect the environment.

IPM does not pose a threat to food security or farmers' stability. Examples of good practices exist across Europe. Research projects<sup>12</sup> show the potential of IPM to increase the resilience of agricultural systems and decrease dependency on agrochemicals. Often mentioned alternatives, e.g. biocontrol, are truly effective only if IPM is properly implemented. Therefore, the implementation of Integrated Pest Management (IPM) is essential. An important basis of IPM is the promotion of functional biodiversity in agricultural areas, to enhance the overall resilience of agricultural systems and reduce vulnerability of cropping systems to pests and extreme weather events.

- 2. Strong definition of Sensitive areas and the ban on the use of harmful pesticides in sensitive areas:**

Protection of sensitive areas, to protect citizens, biodiversity and natural resources from pesticides is urgent. Citizens, nature areas and water resources are heavily impacted by pesticides. For example, important sources of drinking water, located in natural areas, could no longer be used due to excessive pesticide concentrations<sup>13</sup>. In several letters to EU ministers<sup>14</sup>, we have urged opposition to the suggestions to allow the use of harmful pesticides in sensitive areas. Sensitive areas should include at least the areas listed in Annex II. The definition should extend to sports grounds, cemeteries, roads, motorways and railroads margins, industrial ports, airports, industrial areas and overhead power line areas. Also allowing the use of pesticides if citizens are denied access to treated sites does not protect citizens from pesticides - pesticides drift, and their residues stay in the environment and impact health and biodiversity. As an exception, we suggest that low-

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<sup>12</sup> [van der Ploeg et al., 2019](#), The economic potential of agroecology: Empirical evidence from Europe - [IDDRI, 2018](#), An agroecological Europe in 2050: multifunctional agriculture for healthy eating

<sup>13</sup> [Too many pesticides in water: no drinking water from two West Flanders water basins](#)

<sup>14</sup> <https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/Letter%20to%20ministers%20-%20SUR%20and%20Sensitive%20Areas%20-%20September%202023.pdf> - <https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/Letter%20-%20Sustainable%20Use%20of%20Pesticides%20Regulation%20%28SUR%29%20-%20Spanish%20EU%20Presidency%20-%20July%202023.pdf> - <https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/Reaction%20to%20the%20IPM%20compromise%20chapter%20of%20the%20Swedish%20Council%20presidency%20on%20the%20Sustainable%20Use%20of%20Pesticides%20Regulation%20%28SUR%29.pdf>



risk non-synthetic and low-risk biocontrol substances, in case all IPM measures have failed, can be allowed in agricultural areas located in sensitive areas.

Data show that wide buffers around sensitive areas are needed to adequately protect citizens, natural areas and water bodies from pesticides<sup>15</sup>.

We want to stress that an adequate definition of sensitive areas is vitally important for protecting the health of children, the most vulnerable members of our society who deserve special attention and protection. Pesticides have been linked to various health issues in children, ranging from developmental concerns to respiratory problems, as shown in our recent [webinar](#). A strong definition of sensitive areas, which includes areas where children live, play, and learn, is imperative for safeguarding their well-being. Therefore, we ask you to make sure that stringent protective measures are included in the Council text.

The [additional study](#) to the Impact assessment requested by the Council last December and published in July this year, provided solutions and examples of good practices that successfully prohibited dangerous pesticides to protect the health of citizens and biodiversity. The results of the study were not taken into account by the Spanish presidency, so we urge you to correct this omission. We strongly encourage you to make use of such information in your decision-making process.

3. We urge you to support and uphold **national pesticide reduction targets** of at least 50%. As stated in our previous letters scientific evidence consistently highlights the detrimental effects of pesticide use on biodiversity, soil health and water quality<sup>16,17,18</sup>. By setting reduction targets, you signal your commitment to take into account the will of citizens, and to take concrete steps toward protection of ecosystems and ecologically sound and resilient agricultural systems.
4. Ban on the use of **more hazardous pesticides**. The pesticides in this category are very harmful to human health and/or to the environment/biodiversity because of their toxicity, persistence and/or bioaccumulation. Alternatives exist and the health and safety of citizens and the environment should be prioritised.
5. **Harmonised Risk Indicator** - many experts<sup>19</sup> and Member States recognise the faultiness of the current HRI-1 which [favours](#) the most toxic pesticides over the low-risk active substances that are used in larger quantities, but are less harmful to human health and the environment. Without proper HRI, reductions in pesticide use and risk cannot be evaluated and will, therefore, not take place. The HRI must be corrected for pesticide use

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<sup>15</sup> <https://www.pan-europe.info/sites/pan-europe.info/files/public/resources/Letters/Letter%20to%20ministers%20-%20SUR%20and%20Sensitive%20Areas%20-%20September%202023.pdf>

<sup>16</sup> [https://commission.europa.eu/system/files/2023-01/SWD\\_2023\\_4\\_1\\_EN\\_document\\_travail\\_service\\_part1\\_v2.pdf](https://commission.europa.eu/system/files/2023-01/SWD_2023_4_1_EN_document_travail_service_part1_v2.pdf)

<sup>17</sup> [Guyomard, Bureau et al., 2020](#). Research for AGRI Committee – The Green Deal and the CAP: policy implications to adapt farming practices and to preserve the EU's natural resources.

<sup>18</sup> <https://www.inrae.fr/actualites/biodiversite-services-rendus-nature-que-sait-limpact-pesticides>

<sup>19</sup> <https://www.umweltbundesamt.de/en/topics/misleading-calculation-eu-plans-for-pesticide#SUR>

intensity/ha. Also, the categorisation in the 4 risk groups should be improved, in particular regarding group 4 with weighting factor 64 which leads to retroactive reductions in risks, even when no real change in practice takes place (e.g. when a substance is banned). Proposals on improving the existing indicator exist, e.g. pesticide indicators such as NODU, or the one developed by Umwelt Bundesamt, or the Danish Treatment Frequency Index (TFI). The European Green Deal as well as two European Citizens' initiatives include the objective of ambitious pesticide reductions to protect human health and the environment: a fit-for-purpose indicator must be used to track progress towards targets.

6. **Monitoring:** Member States should report annually their progress on:
  - a. reaching the pesticide reduction targets,
  - b. planned and adopted measures and precise quantitative data relating to compliance with provisions on pesticide use,
  - c. implementation of integrated pest management and crop-specific rules,
  - d. monitoring of pesticides residues and metabolites, including the in soil, water, indoor dust, and in humans,
  - e. the support provided to farmers (e.g. independent advisory systems) to implement the provisions of the SUR,
  - f. progress in substituting the most hazardous chemicals, including the comparative assessments.
  
7. **Retailers**, as key players in the food chain, should be engaged in reaching the pesticide reduction targets, by drafting and publishing on their websites an action plan for the reduction of the use and risk of pesticides, with the planned and adopted measures to support their suppliers in the implementation of integrated pest management. For a successful implementation of the SUR, it is key that retailers establish meaningful engagements with farmers, in view of implementing IPM and reaching pesticide reduction targets. Retailers should set targets to achieve zero residues in food products.
  
8. As in the Directive 2009/128/EC and Regulation EC no 1107/2009, include **the precautionary principle**, set out in Article 191 of the EU Treaty. EU pesticide legislation states that the objective of protecting human and animal health and the environment should take priority over the objective of improving plant production. Therefore, in case of scientific uncertainty regarding risks, the precautionary principle should be applied. This principle should remain key in the SUR, and should also ensure that Member States further restrict or prohibit the use of pesticides in specific circumstances or areas.

#### Annex II

- all public areas (parks, gardens, recreation and sports grounds, ...).
- human settlements and all urban areas, including private gardens and kitchen gardens.
- areas frequented by vulnerable groups.

- all houses, gardens and other private properties (including private sports and recreation sites) where people live, work, spend free time and play. People, including vulnerable groups, often spend most of their time at home, where they should be protected from exposure to pesticides.
- protected areas under Directive 2000/60/EC and Directive (EU) 2020/2184 (with exception of Annex IV 1 (iv) of Directive 2020/2184)
- areas around surface water bodies
- ecologically sensitive areas, including all nature 2000 areas (Directive 92/43/EEC and Directive 2009/147/EC), as well as all other regional or national protected areas in function of nature, habitat and biodiversity protection.
- railways, roads, motorways and railroad margins, cemeteries, airports and ports, industrial or commercial units, overhead power line areas, mines, dumps and construction sites.