



Dr. Vytenis Andriukaitis
Commissioner for Health and Consumer Policy
European Commission
B-1049 Brussels.

Brussels 3 May 2018

Open letter: implementing Directive on Sustainable Use of Pesticides to ensure compliance with neonicotinoid restrictions

Dear Commissioner Andriukaitis,

The Pesticide Action Network Europe (PAN Europe) and its members welcome the recent vote of Member States backing the European Commission proposal to further restrict the use of three neonicotinoids active substances (imidacloprid, clothianidin and thiamethoxam).

We believe that the best way forward to ensure compliance is through serious implementation of the Directive 2009/128/EC on the sustainable use of pesticides (SUDP), especially making sure that the SUDP is integrated as broadly as possible into the EU's Common Agricultural Policy in the upcoming reform. This would also help to respond to the concerns of those Member States and groups who had reservations about the restrictions, and help to limit essential use derogations given under article 53(2) of EU Regulation 1107/2009.

We encourage you to make sure that the SUDP objectives becomes fully integrated in the CAP delivery model, as the current Common Agricultural Policy ([CAP is not delivering in terms of pesticides](#)¹). Including key approaches and requirements of the SUDP such as Integrated Pest Management (IPM) linked to pesticide use reductions would help farmers to use alternatives through. Use of IPM has been mandatory, according to the SUDP, since January 2014.

The way forward: **CAP strategic plans need to include relevant actions on pesticides**, including

- **Pesticide dependency reductions** should become one of the performance indicators with ambitious quantitative targets, timetables and measures that each Member State needs to deliver as part of their CAP strategic plans.
- **Crop rotation** should become one of the mandatory requirements, instead of the current crop diversification. Long term crop rotations are an important alternative to the use of neonicotinoids in many arable crops.
- The Farm Advisory Systems (FAS) must become an effective **independent advisory service across Europe**, able to assist famers in applying the restrictions on

¹ Also the [leaked version of the CAP](#) clearly shows that also the CAP delivery model does very very little to encourage pesticide use reductions (with only one reference left when talking about research needs).

neonicotinoids, start using alternatives and ensure the transition to towards genuinely low impact farming systems.

Integrating the above mentioned aspects in the CAP delivery model would help to overcome some of the shortcomings in the current SUDP implementation, as already identified the European Commission's own [report evaluating Member States progress in the implementation of the SUDP](#) which inter alia says (on page 5): *'Integrated Pest Management (IPM) is a cornerstone of the Directive, and **implementation of IPM is the intended means to reduce the dependency on pesticide use** in sustainable agriculture, and thus the lack of clear steps that can be assessed, measured and enforced is a significant area for improvement in the ongoing review of national action plans by Member States.'*

In the specific part on IPM (on page 13), the report highlights: *'Member States need to develop clearly defined criteria so that they can assess systematically whether the eight principles of IPM are implemented, and take appropriate enforcement measures if this is not the case. Such tools could confirm that the **intended outcome of IPM as specified in the Directive, a reduction of the dependency on pesticide use**, is being achieved.'*

The report continues (on page 14): *'Member States have not converted the IPM principles into prescriptive and assessable criteria. They see IPM mainly as an education tool for farmers, and have no methods in place to assess compliance with IPM principles. While Member States take a range of measures to promote the use of IPM, this does not necessarily ensure that the relevant IPM techniques are actually implemented by users. Farmers are economic operators, and while IPM techniques are sustainable from a long-term perspective, IPM can mean a higher economic risk in the short-term. For example, it may be seen as preferable to grow maize or wheat in monoculture for economic reasons. However, this short term approach to land management comes at considerable risk of longer term cost, for example due to increasing populations of pests or weeds in monoculture. Ultimately, monoculture can cause loss of biodiversity, soil erosion and even desertification. As an example of a short-term approach, Romania granted emergency authorisations for using neonicotinoids as seed treatment in an undefined area of maize, without investigating the potential of crop rotation as an alternative.'*

And finally, as a conclusion to the fact-finding missions to Member States in 2017, the report says (on page 14): *'In all six Member States visited, the authorities stated that in their view, some IPM techniques could be adopted on a more widespread basis, such as crop rotation, proper selection of seed and planting material and use of adequate cultivation techniques.'*


Integrating pesticide use reduction targets, crop rotation and independent farm advisory systems into the CAP delivery model, is thus crucial to ensure serious implementation of the SUDP. An ambitious piece of legislation like the SUDP needs big spending programmes like the CAP to be successfully implemented. We encourage you to not miss the opportunity of the CAP reform to finally get results, and incorporate real IPM and indicators of pesticide use reduction into the draft CAP regulations during the inter-service consultation.

However, an analysis of DG SANTE's homepage, attached, gives the impression that the issue of pesticide dependency reductions has not been of interest so far. Your homepage constantly refers to 'reducing the risks and impacts of pesticide use', despite the fact that the SUDP actually refers 'reduction in the dependency on pesticide use' no less than seven times in articles 4 and 15 and their recitals. We hope you will change this shortly, as well as calling for above mentioned changes to the CAP.

Finally, a real implementation of IPM linked to pesticide use reductions would support the European Commission in its handling of point 3 of the European Citizens' Initiative on glyphosate (setting EU-wide mandatory reduction targets for pesticide use, with a view to achieving a pesticide-free future). The Commission's reply to the ECI mentions: *'EU policy is already directed towards reducing dependency on pesticides and achieving a pesticide-free future as requested by the European Citizens' Initiative. The Commission will strive to ensure that Member States comply with their obligations under the [Sustainable Use Directive](#) and reduce dependency on pesticides.'*

As ever, we are happy to discuss the issues surrounding implementation and stand ready to assist a successful mainstreaming in any way we can.

Sincerely yours,

A handwritten signature in black ink, consisting of several overlapping, fluid strokes that form a stylized, somewhat abstract shape.

Francois Veillerette
PAN Europe President