



**Pesticide
Action
Network**
Europe

*'The transition to sustainability presents a 'first mover' opportunity for all actors in the EU food chain'
Farm to Fork (F2F)*

PAN Europe's position on the evaluation of the EU agricultural promotion policy

Pesticide Action Network Europe (PAN) Europe welcomes the opportunity to comment on the inception Impact Assessments of the EU's agricultural promotion policy (1), providing our views on the Commission's understanding of the problem and possible solutions and be allowed to provide relevant information, including on the possible impacts of different options.

We propose that the Commission aligns the EU promotion of agricultural products with the European Green Deal, therefore focusing on the promotion of circular and sustainable models rather than on competitiveness, with a special focus on pesticide use reductions. Below we explain how.

1. The Commission must reconsider its policy focus towards citizens rather than businesses

In the 'concept' of the inception impact assessment to the promotion policy, mention is made of: *'The evaluation found no major inconsistencies with other EU policies but noted that the promotion policy could be better aligned with political priorities and contribute in particular to the objectives of the Farm to Fork strategy.'*

The European Green Deal (EDG) aims at *'a new, sustainable and inclusive growth strategy to boost the economy, improve people's health and quality of life, care for nature, and leave no one behind'*. It is crucial that future impact assessments changes focus away from sectorial approach towards societal approaches.

The EGD encourages a 'non-toxic business model', with one of the key objectives of the Farm to Fork (F2F) strategy being reducing pesticide use and risk by 50% by 2030.

PAN Europe and its member organisations call on the European Commission to reserve a special part of the impact assessment for looking at the societal costs of farmers spraying pesticides to produce for export markets with a few examples mentioned below (2).

2. The European Commission must reorient its policy focus towards sustainability rather than on competitiveness

In the 'context' of the inception impact assessment to the promotion policy, it is mentioned that: *'The policy's review should enhance its contribution to sustainable production and consumption, in line with evolving diets, while maintaining or even increasing the policy's effectiveness in supporting the agrifood sector's competitiveness'*.

The F2F aims to *"seek commitments from food companies and organisations to take concrete actions on health and sustainability."* Also, it calls to *"revise marketing standards while 'strengthen[ing] the legislative framework on geographical indications (GIs) and, where appropriate, include[ing] specific sustainability criteria."*

PAN Europe and its members call on the European Commission to develop a policy review supporting sustainability rather than competitiveness.

3. The European Commission should add another policy option: eligibility limited to promotion of circular and organic products

The inception impact assessment to the promotion policy proposes three policy options in part B. PAN Europe calls for another option to be added.

Currently, the EU's promotion programme wrongly considers products coming from Europe as sustainable, setting aside that there are [pesticide residues also in European food](#) and that [European annual pesticide sales](#) remain stable at around 400,000 tonnes of active substances. The reality is that there are huge differences between how farmers use pesticides and the production methods they apply, making these large-scale generalisations erroneous.

The issue of the presence of residues of chemicals in food is of special interest to European citizens. Time and again, pesticide residues found in fruit, vegetables or cereal are the number one concern around 'food related risks' in regular surveys conducted by the [European Food Barometers](#). But the food-related risks of pesticide residues are also of increasing interest to consumers outside of Europe. [A study from December 2014](#) shows for instance that the Chinese are worried about all food-related hazards, including food containing pesticides or veterinary drug residues.

In these COVID-19 times, spending another 200 million EUR of European citizens' taxpayer money to pay agri-business up to 80% compensation for promoting the export of conventional agricultural products around the world seems simply inappropriate. Instead, we should focus on obtaining increased transparency in the European food chain (business to consumer), and better and more localised links between farmers and consumers. Doing so will not only help European citizens make better consumer choices, it could also be a way to help kick off the recovery in parts of the sector which suffered enormously from the COVID-19 crisis, such as tourism.

We therefore call on the European Commission to add another policy option looking at eligibility criteria limited to promotion of organic products and pesticide-free local products and with development of more circular economies.

4. The scope of the EU's promotion policy of agricultural products should be enlarged to encourage local exchanges between citizens and farmers

It is time to reflect on the scope of the EU promotion of agricultural products: among others, that scope includes to '*highlight the specific features of agricultural production methods in the Union*'. In reality, there is absolutely no specific link to production methods!

PAN Europe has asked the European Commission on several occasions about how the promotion programme considers pesticides, and we invited the EC to focus on agronomic practices as a more sustainable way to achieve pesticide reductions. The European Commission often replied stating that the programme has been supporting organic agriculture, but also recognises that no other special focus has been given to promote products with low levels of pesticide residues. This need to change.

We point to the fact that one of the few positive aspects of the COVID-19 lockdown has been that people have started paying more attention to food. The consumption of organic agriculture has increased significantly, people are preparing and cooking their own food more, and citizens are increasingly looking to nature-based solutions for positive experiences. For instance, 78 000 Danes followed online when Danish organic dairy farmers let their cows graze outside in spring 2020, with happy heifers all around. So, we should use this moment to zoom in on farming and work with nature.

PAN Europe and its members propose to use this revision to consider expanding the eligible actions to cover the creation of links between citizens and local farmers.

5. The impact assessment should look at how environmental and public health NGOs / consumer organisations / citizen forums can help the promotion of EU products

Time and again, the Eurobarometer survey on food safety shows that EU citizens trust consumer organisations and environmental NGOs: therefore, in order to boost the sustainability criteria, this

revision should look into the benefits of involving at least one consumer organisation or environmental NGO in each project.

Example concerning how retailers can scale-up sustainable and socially responsible production methods:

Swedish producer association KRAV also involved NGOs to appeal to Swedish retailers on the need to give them shelf-space during COVID-19 (read [here](#)).

Example of how a few farmers are willingly engaging with other farmers and citizens in discussions about production methods and sustainability:

See for instance the videos of Paolo Mosca and *Cascine Orsine* on sustainable rice growing on PAN Europe's homepage: <https://www.low-impact-farming.info/rice-growing>

Notes

(1): <https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12782-EU-farm-and-food-products-review-of-policy-on-promotion-inside-and-outside-the-EU>

(2) A few estimated annual economic loss caused by pesticide use in the EU:

- Studies in the UK and Germany indicate US\$257m and \$166m, respectively, paid by sufferers of pesticide-related health and environmental issues and citizens (Pretty & Waibel, 2005).
- UK water companies spent £189 million removing nitrates and £92 million removing pesticides from their water supplies between 2004-2005 and 2008-2009 (National Audit Service, 2010)

Pesticide Action Network Europe (PAN Europe) was founded in 1987 and brings together consumer, public health, environmental organisations, and women's groups from across Europe. PAN Europe is part of the global network PAN International working to minimise the negative effects and replace the use of harmful pesticides with ecologically sound alternatives.

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