



## Input to ‘Sustainable use of pesticides – revision of the EU rules’

**“If biodiversity is to be restored in Europe and opportunities are to be created for crop production utilizing biodiversity-based ecosystem services such as biological pest control, there must be a Europe-wide shift towards farming with minimum use of pesticides over large areas”**  
(Geiger, F. et al. 2010)

### **PAN Europe’s position on the ongoing public consultation on the ‘Sustainable use of pesticides – revision of the EU rules’**

#### **1. PAN Europe contests the timing of this revision**

The consultation claims that ‘*The preliminary results of the evaluation will be used to establish the baseline situation for the impact assessment, refine the problem definition and the policy options and feed into their analysis.*’ In the roadmap to the Farm to Fork Strategy, it emerges that this initiative will be concluded in Q1 of 2022.

Against this backdrop, Pesticide Action Network Europe (PAN Europe) and its members wonder why the European Commission is considering to make an impact assessment.

The Better Regulation Guidelines from the Commission allow it not to conduct an impact assessment in case of any “*political imperative to move ahead quickly*”; moreover, the immediate actions required to meet the objective of a 50% reduction of pesticide use by 2030 of the Green Deal means that the European Commission is not obliged to carry out an impact assessment.

Furthermore, the numerous reports from the European Commission itself, from the European Parliament, as well as from civil society (PAN Europe included) and from scientific institutions clearly show the lack of implementation of the SUD over the years, the increase in uses of pesticides in many Member States, the increase in the provision of derogations to bans/restricted pesticides ([List of Emergency Authorisations per Member State 2019 Ares\(2020\)375494.pdf](#)). The massive failure in the implementation of the SUD is another reason why impact assessment is not needed, as there is actually very little to assess.

Therefore, PAN Europe and its members call on the Commission to proceed without carrying out this evaluation process, improving the SUD and finally making sure Member States implement it. Indeed, the failure of implementation at Member States’ level is the resultant of a deplorable and unjustifiable failure to act on the Commission’s side.

The evaluation that is being proposed to be conducted seems more focussed on overcoming legislative obstacles in certain articles of the SUD allowing farmers to spray more precisely (ex. on the current rules on aerial spraying putting a ban on drones) rather than allowing farmers to start working with nature in full harmony with what is foreseen in the SUD. So, if the European Commission goes ahead with the plan of conducting an evaluation, it should at least update its reform proposal on the Common Agricultural Policy (CAP) to make payments conditional on farmers implementing integrated pest

management (IPM) and engaging in reducing their pesticide use, while focussing the evaluation on 1) how to obtain a correct implementation of the SUD following the recommendations from the Thematic Strategy on SUD from 2007; 2) how to link the SUD to the REFIT while developing pesticide use indicators, and; 3) make one of the impact assessment options a synthetic pesticide free future by 2035.

### **Explanation**

[The thematic Strategy on SUD](#) published in 2007 already foresees two types of measures to be added to the SUD if its implementation fails: namely, Quantitative use-reduction targets and setting up a system of taxes/levies on pesticide use. Until now, neither of these measures has been put in practice in the vast majority of Member States.

Article 4 of the SUD foresees that the European Commission evaluates the Member States' implementation of the SUD by making one report in 2014 and another one in 2018 - if needed, the latter accompanied by proposals for law changes. The European Commission had a three years' delay in preparing its first report and a two years' delay in preparing its second report evaluating member states' implementation of the SUD. In both reports the European Commission reaches the same conclusions, namely that Member States are not delivering on the SUD, and especially not on IPM.

Recital 35 of the EU Regulation No 1107/2009 on authorisation of plant protection product states that the principles of Integrated Pest Management (IPM) were supposed to be included into CAP cross-compliance. In the 2013 CAP reform, the European Commission had proposed to include IPM into cross-compliance but this was replaced with the European Parliament and the Council (in Addendum 2 to the CAP reform agreement of 25 June 2013) calling on the European Commission to monitor the transposition '*with a view to including the relevant parts of these Directives in the system of cross-compliance*'. The European Commission has not done anything to ensure such transposition. In addition to this, the 2018 Proposal from the European Commission for a CAP SP Regulation fails to address this issue. Indeed, IPM is not included in the new mechanism of "conditionality".

## **2. PAN Europe opposes 'new technologies' being considered as a policy option**

The consultation document explains that the evaluation '*will assess whether the SUD is best designed to sufficiently promote low pesticide input pest management systems as well as take advantage of existing knowledge and new findings and technologies and the wider application of innovative and precision farming techniques that may help to reduce the use and risk of chemical pesticides*'. The document mentions among others '*the potential of drones and more modern and targeted pesticide application systems*'.

PAN Europe recalls that the main objective of the SUD is about introduction of integrated pest management and of alternative approaches or techniques in order to reduce dependency on the use of pesticides. In both assessment reports, the European Commission concluded that the main failure of the SUD implementation to date has been engaging farmers in the IPM approach. PAN Europe recalls the [reflection](#) by Danish-American scientist Katherine Richardson, highlighting that technology can help us use resources more efficiently but technology does not solve the problem, as it cannot change the fact that the Earth's resources are limited.

PAN Europe reminds the Commission that a series of farmers throughout the EU have already made substantial progress in applying IPM not just for greenhouse cultures but also in field crops. Some Member States and part of the chemical pesticide industry try to give the impression that IPM is

suitable only for protected crops in greenhouses and is only slowly starting to be applied in orchards, but this is not the case in practice and has to be challenged.

**PAN Europe encourages the European Commission to include the following material into the evaluation:**

- Presentations and especially conclusions of the 7th annual symposium on the SUD, organised as a collaboration between the European Parliament and PAN, IBMA and IOBC, [here](#) especially highlighting the problems consistently raised regarding the lack of progress and urgency on real implementation and unwillingness to pay attention to real and fully identify bottlenecks including the approvals process for biological control which is actually within the remit of other EU legislation in urgent need of improvement.
- Scientific articles giving concrete ideas on how to work with nature, starting with Herz et al (2019) [Managing Floral Resources in Apple Orchards for Pest Control: Ideas, Experiences and Future Directions](#), Andrea Veres, Kris A. G. Wyckhuys, Jozsef et al. ‘[An update of the Worldwide Integrated Assessment \(WIA\) on systemic pesticides: Alternatives in major cropping systems](#)’ [Environmental Science and Pollution Research](#) Erisman et al (2016): [Agriculture and biodiversity: a better balance benefits both](#)

### **3. PAN Europe opposes ‘guidance’ as the tool to ensure enforcement**

The consultation document mentions that the policy options to be studied include ‘*improved enforceability of the SUD, for example through better operationalisation of integrated pest management principles, a greater emphasis on implementation of national action plans and possible annual reports on progress achieved by Member States, improved guidance and possible trainings from the Commission, or the possibility of changing the legal instrument to a Regulation to ensure direct applicability in all Member States*’

PAN has consistently indicated how badly the SUD has been implemented to date by most MS, including through its report ‘reducing pesticide use across Europe’ in 2013, [here](#), regarding the quality of National Action Plan.

PAN recalls the apparent lack of urgency in the Commissions’ own reports, both regarding timing and regarding stimulation or even challenge of Member States through its 2017 report ‘[PAN Europe reaction to the assessment report on the sustainable use of pesticides Directive](#)’, and its 2018 report ‘[Monitoring EU SUD compliance in Sweden, Denmark, Poland, Germany, Italy and the Netherlands: PAN’s suggestions for better future auditing and implementation](#)’.

**PAN recommends that these reports and the issues raised within regarding SUD implementation form part of the revision preparation.**

### **4. PAN Europe recalls the meaning of true costs**

The consultation says that the evaluation ‘*will assess costs and benefits of the actions and their EU added value*’.

PAN Europe recalls that there are numerous negative externalities relating to pesticides. In this respect, **we invite the Commission to include in its evaluation reflections from the following**

**scientific papers:** Pretty, J. and Waibel, H. (2005). Paying the price: the full cost of pesticides. In: *The Pesticide Detox. Towards a more sustainable agriculture*. Pretty, J. (Ed). Earthscan, London, pp 39-54, [here](#) Denis Bourguet and Thomas Guillemaud (2016) the hidden and external costs of pesticide use, [here](#).

PAN Europe recalls that agronomic practices deliver over time. In this respect, **we invite the Commission to include in its evaluation reflections the following papers:** PAN Europe paper on benefits of long term crop rotation [here](#), as well as the report that the European Commission, DG ENVI, commissioned on crop rotation in 2010, [here](#).

PAN Europe recalls that a number of studies shows that farmers are over-reliant on pesticides. In this respect, **we invite the Commission to include in its evaluation reflections the following scientific papers:** Lechenet, M., Dessaint, F., Py, G. et al. (2017): Reducing pesticide use while preserving crop productivity and profitability on arable farms. *Nature Plants* 3, 17008, [here](#), Jacquet, F., Butault, J. P., & Guichard, L. (2011): An economic analysis of the possibility of reducing pesticides in French field crops. *Ecological economics*, 70(9), 1638-1648 [here](#) Skevas, T., & Lansink, A. O. (2014): Reducing pesticide use and pesticide impact by productivity growth: the case of Dutch arable farming. *Journal of agricultural economics*, 65(1), 191-211 [here](#) and Alternatives au glyphosate en grandes cultures : évaluation économique [here](#).

Finally, in light of the new EU objective fixed in the Farm to Fork and the Biodiversity strategies as well as the objective of ecological transition, **we invite the European Commission to reflect on new business models delivering on good agronomic practices and agro-ecology**, such as the [IDDRI study from 2018](#) and [Jan van der Ploeg study from 2019](#), as a complement to Horizon 2020 projects like [Diverimpacts](#) and [Lift-H2020](#).

## 5. Policy coherence in analysing which policy tools reach the SUD objectives

The 2007 Thematic Strategy on SUD predicted the setting up of a system of taxes/levies on pesticide use. In light of the scarce effectiveness the current policy has had in delivering on the SUD, **we call on the evaluation to look into the policy coherence of encouraging pesticide taxation**, and, as part of that, to include studies like Finger, R., Möhring, N., Dalhaus, T., & Böcker, T. (2017): Revisiting pesticide taxation schemes. *Ecological Economics*, 134, 263-266 , [here](#), and Pedersen, A. B., Nielsen, H. Ø., Christensen, T., & Hasler, B. (2012): Optimising the effect of policy instruments: a study of farmers' decision rationales and how they match the incentives in Danish pesticide policy. *Journal of environmental planning and management*, 55(8), 1094-1110, [here](#)

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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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