



**Pesticide
Action
Network**
Europe

Factsheet: Contribution to the EU feedback mechanism on Statistics on Agricultural Input and Output (SAIO)

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Statistics on Agricultural Input and Output (SAIO)

The European Commission is planning to consolidate and streamline European statistics for agricultural products and inputs (SAIO). PAN Europe welcomes this effort of harmonisation and rationalisation of statistics. Nevertheless, it highlights the importance of obtaining more detailed and more independent statistics on the use of pesticides and exposure to them, in order to monitor progress towards the achievement of the Farm to Fork and Biodiversity Strategy targets. Below we will explain how

As explained in [the roadmap](#) for a Regulation on Statistics on Agricultural Input and Outputs (SAIO), the EU's collection of data is in need of an update in order to take account of changes in agriculture, the CAP, and other related EU policies. The idea behind the SAIO initiative is to modernise European Union agricultural statistics undertaken by the European Commission in close cooperation with EU Member States.

1. Pesticide use statistics should not become secondary legislation

The roadmap explains: *'SAIO is planned to replace existing regulations, directives and voluntary gentlemen's or European Statistical System agreements on crops, livestock, milk, organic farming, plant protection products, nutrients and agricultural prices with a new regulation and corresponding secondary legislation to better integrate the statistical domains into one system.'*

PAN Europe recalls that statistics on the use of pesticides and other inputs have to be collected so that (in addition to use per hectare of any given crop) also use per kg of any final product shall be taken into account. Such data is important for a more holistic assessment of the food system and especially for guiding consumer choices.

The roadmap highlights: *'The initiative seeks to provide data and the necessary flexibility for two of the new Commission's six headline ambitions: 1) A European Green Deal – Farm to Fork Strategy/Sustainable Food System, and 2) An economy that works for people – agricultural employment, production and trends.'* Recognising that *'Specifically the farm to fork strategy will require high-quality agricultural statistics to fulfil its ambitions.'*

As pesticide use and risk reductions are at the core of the Farm to Fork strategy (F2F) it is crucial that SAIO does not relegate pesticide use statistics to implementing (secondary) acts, but instead that it make pesticide use statistics remain at the core of the new regulation, ensuring that the general public as well as the European Parliament, which has been elected by EU citizens, continues to have a say.

2. Implementation of EU regulations on pesticide use from 2009 must continue

While the EU has started to obtain information about pesticide sales across the EU, there is little knowledge about the actual on-the-ground use of pesticides, despite it being a crucial factor to ascertain if we want to convince EU citizens that EU policies are delivering.

Since 2011, farmers are obliged to register their pesticide use under article 67 of Regulation (EC) No 1107/2009 on the authorisation of pesticides. Member States are obliged to publish use statistics according to article 15.2 of the Directive 2009/128/EC on the Sustainable Use of Pesticides (SUD). Finally, Regulation (EC) No 1185/2009 on pesticide statistics states in recital 6 that *'statistics need to be detailed up to the level of the active substances'*, while recital 7 mentions *'mandatory data collection was recommended as the best option because it would allow the development of accurate and reliable data on the placing on the market and use of pesticides quickly and cost-efficiently'*.

As shown in Eurostat's data collection on [agricultural use of pesticides in the EU](#), the current problem is that, in the data collection that took place in 2015, Member States use different baselines and different crops making it difficult to compare data on pesticide use. Further, details on active substances are non-existent.

The European Commission, in its 2017 [REPORT](#) on the implementation of Regulation (EC) No 1185/2009, had acknowledged the problem and had proposed a solution. That same report also has a number of other very relevant proposals on how to proceed towards getting more detailed information on pesticide use statistics. This begs the question as to why the European Commission waited until [2019](#) to start seriously discussing this with Member States.

To respect the rule by the European Court of Justice regarding citizens' right to know about environmental emissions, PAN Europe calls on the European Commission to propose the following changes to EU pesticide statistics now:

Sales data:

- Publish annual sales data by active ingredients for each country for any active substance without aggregation.
- Refine the chemical groups for publishing. The current chemical groups are insufficient. CO2 and other storage pesticides need own grouping. Also low-dose pesticide groups such as mectine insecticide and "sulfurons" (sulfonyurea) herbicides.

Use data:

- Publish representative annual use data for all significant (large area [ex. maize, wheat, barley] and high intensity [ex. apples, vine, potatoes]) crops based on collection from farm data to publish disaggregated use data per crop, per region, per year of active ingredients.

As part of the evaluation report on the implementation of Regulation (EC) No 1185/2009, that the European Commission should send to the Council and the European Parliament next year, PAN Europe calls for reflections on:

- How to link statistics on toxicology (pesticides) and statistics of agronomy (uptake of integrated pest management) while starting to conduct public information campaigns on why farmers are spraying.

- Over time, to ban the use of surveys as a collection technique of data, and a unique monitoring tool, and instead start building up reliable data by collecting it directly from farmers, as foreseen in article 67 of Regulation 1107/2009.

A few Member States, in their National Action Plan on the sustainable use of pesticides are recognising the importance of starting more holistic reflections; for instance, the French NAP states: *‘Farming practice surveys will be continued and, where possible, fleshed out with indicators to follow changes in agricultural practices more efficiently (e.g. utilised agricultural area rate for organic farming, use of PPE, training, use of decision-making tools, ecological focus areas, crop rotations, tillage, crop combinations, cover crops etc.).’*

3. Statistics should not be a race to the bottom

The roadmap calls for: *‘Comparable, harmonised and high-quality data are in and of themselves required to allocate resources fairly, efficiently and effectively and help make the best possible decisions across Member States. This can only be achieved and ensured by a common and coordinated approach in the European Statistical System.’*

PAN Europe insists on the importance of moving towards the most advanced indicators, allowing the few Member States that have already developed more advanced indicators in relation to pesticides use (for instance also considering health and environmental factors) to keep and further improve them as a complement to the more basic harmonised indicators being developed at EU level; PAN Europe also insists on the importance of other Member States starting to apply similar indicators.

For example, Germany and The Netherlands monitor pesticide amounts used and areas treated. The Netherlands monitor which crop rotations farmers are conducting on their farms.

4. Citizen Science for Environmental Monitoring to obtain full recognition

The roadmap for a Regulation on Statistics on Agricultural Input and Outputs highlights: *‘In general, the evaluation diagnoses, the predicted impacts and the expected improvements by implementing the strategy are being validated. For example, the new flexible approach to data sources, provided their quality is ensured, gives Member States liberty to choose more cost-effective sources or to develop innovative approaches e.g. with regard to data from precision farming equipment or the use of satellite data.’*

As mentioned in point 2, PAN Europe insists that the collection of data on pesticide use needs to be conducted as foreseen in the regulations and is not to be replaced by precision techniques, satellite images etc. Also, PAN Europe draws the attention of SAIO to the potential of citizen Science for Environment monitoring on pesticide emissions.

As mentioned in European Commission staff working document ([SWD\(2020\) 149 final](#)) is *‘the volume of environmental knowledge generated by citizen science initiatives across the EU offers a unique opportunity to help deliver on the European Green Deal and other EU (and global) priorities, and to involve the public in EU policy-making.’*

In relation to pesticides, the document states: *‘Plant protection products (pesticides) represent a major pressure on the environment (in particular biodiversity and water) and human health. However, the quality of data on the impacts is still inadequate. Currently, Member States report annual data on pesticide sales and on their actual use (on selected crops) every 5 years; both datasets tend to be incomplete and unharmonised. There is currently no EU-wide*

initiative to collect data on the presence of pesticides in the environment. However: the EU-funded INSIGNIA project¹²⁷ aims to develop a protocol for a monitoring programme whereby beekeepers will collect pollen samples from honeybee colonies in order to analyse pesticide residues and botanic origin. Once rolled out, the protocol will enable the generation of high-quality data on pesticide presence in the environment across the EU. It will be implemented on the ground from late 2020 by a preparatory action initiated by the European Parliament, with an EU-funded budget of €3 million.'

5. Move towards building up independent EU monitoring tools

The LUCAS survey (Land Use/Cover Area frame statistical Survey) collects information on land cover and land use in a harmonised way across all EU Member States. In the 2015 survey, Wageningen University tested for pesticide residues in the samples. Thanks to Questions from Members of the European Parliament ([E-003861/2020](#)), it was made clear that the Commission still had not tested for pesticide residues in the 2018 samples and that only a few of the samples will be tested. Also, these questions clarified that at this point in time, there is no legal basis on the long-term for LUCAS beyond the 2022 campaign, and that the for the LUCAS survey 2022 does not currently cover laboratory analysis for pesticide residues.

PAN Europe calls for LUCAS to obtain a legal base and appropriate funding, which should also include testing of pesticides in the soil, as well as landscape elements and weeds.

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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