



**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 statistic 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 monitor progress towards the Farm to Fork and Biodiversity Strategy targets. Below we will explain how but call.**

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

- **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 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 seen. Such data is important for 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 is 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 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.

- **Implementation of EU regulations on pesticides 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 use of pesticides despite being a crucial factor 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 Sustainable Use of Pesticides (SUD). Finally, Regulation (EC) No 1185/2009 on statistics on pesticides says 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 the Eurostat's data collection on [agricultural use of pesticides in the EU](#) the current problem is that Member States in the data collection that took place in 2015 use different baselines and different crops making it difficult to compare data on pesticide use. Furthermore, details on active substances are non-existent and there are no distinction between pesticides used inside and outside the agricultural sector.

The European commission's in their [REPORT](#) from 2017 on the implementation of Regulation (EC) No 1185/2009 had acknowledged these problems and proposed a number of solutions. Question is, why did the European Commission wait until [2019](#) to start seriously discussing this with Member States among engaging the Joint Research Centre to make a [report](#)?

As a result of the verdict *Lars Neumeister versus the Government of Germany*, represented by the Bundesamt für Verbraucherschutz und Lebensmittelsicherheit regarding citizens right to know about environmental emissions, **PAN Europe calls on the European Commission to catch up with the delay and change 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 be published disaggregated use data per crop, per region, per year of active ingredients, this way around also being able to distinguish between use in agricultural and non-agricultural areas.

Taken into account that the [Court of Auditor report](#) on pesticide use calls for the need to *'Improve statistics on pesticides when revising the legislation to make them more accessible, useful and comparable; and assess the progress made towards policy objectives, improve the harmonised risk indicators, or develop new ones, taking account of the use of pesticides'* and the [question and answer](#) to farm to fork recognised the need for more data on pesticides use,

saying: *To refine the approach, the Commission will develop further indicators and propose changes to the 2009 Regulation concerning statistics on pesticides.*

**PAN Europe calls for that the evaluation report on the implementation of Regulation (EC) No 1185/2009 that the European Commission should sent to the Council and the European Parliament next year contains proposals on:**

- Collection and publication of information regarding why farmers are spraying.
- Stop using surveys as collection technique of data as a unique monitoring tool towards building up reliable data by collecting data from farmers as foreseen in article 67 of Regulation 1107/2009.
- How to link statistics on toxicology (pesticides) and statistics of agronomy (uptake of integrated pest management)

A few Member States, in their National Action Plan on sustainable use of pesticides are recognising the importance of starting more holistic reflections, for instance does French NAP say: *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 MS having developed more advanced indicator in relation to pesticides use (for instance also considering health and environmental factors) to keep and further improve these indicators, as a complement to the more basic harmonised indicators being developed at EU level, and work for that other Member States start applying similar indicators.

Ex. Germany and Netherlands does monitor pesticide amounts used and areas treated. Netherlands does monitor which crop rotations farmers are doing on their farm. Such statistics should become mandatory in all Member States, which together points mentioned in point above, should become the basis of future EU statistics.

PAN Europe recalls that relying on the chemical industry to obtain use data would be a failure like was done in 2007. According to leaked document from Corporate Europe Observatory (CEO) it is clear that the European Crop Protection Association (ECPA) do not want to share information. The CEO report says: *“ECPA sent an email to the Commission explaining that they are not in a position to provide data on the uses of the most common active substances supplied by their members in different Member States.”*

### **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.*

**PAN Europe insists as mentioned in point 2, that collection of data on pesticide use needs to be done as foreseen in the regulations not to be replaced by neither 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 this document says: *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 project<sup>127</sup> 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 of independent EU monitoring tools**

The LUCAS survey (Land Use/Cover Area frame statistical Survey) collects in a harmonised way across all Member States information on land cover and land use. In the 2015 survey, Wageningen University tested for pesticides residues in the samples. Thanks to Questions from Members of the European Parliament ([E-003861/2020](#)), it was made clear that the Commission has still not tested for pesticides 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 that LUCAS obtains a legal base and appropriate funding, and should include testing of pesticides in the soils, 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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