



Factsheet: Contribution to the public consultation on EU 2030 Biodiversity Strategy

“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)

Factsheet: Contribution to the EU roadmap on Safeguarding nature – EU 2030 biodiversity strategy

PAN Europe welcomes that the new European Commission has started its five years in office with a consultation on biodiversity; we hope that this means putting biodiversity first on the EU agenda to underline the argument in the European Green Deal that ‘*The EU has the collective ability to transform its economy and society to put it on a more sustainable path*’. However, in order to make this happen the European Commission needs to seriously reconsider identified problems and actions proposed in the roadmap to also include the agricultural sector, and the need to gradually remove its dependency on chemicals.

The previous Biodiversity Strategies for 2010 and 2020 have failed to meet their objectives. PAN Europe welcomes this new attempt to define an EU-wide Biodiversity Strategy, but wishes to underline that this ‘new version’ should be considered the last chance for the European Commission to develop such a strategy, as its credibility is now seriously undermined.

Under the feedback mechanism, the European Commission has launched a 4-week public consultation and published a roadmap on Safeguarding nature – EU 2030 biodiversity strategies¹.

This roadmap identifies the problem that this initiative aims to target as being: *‘[The main direct drivers of biodiversity loss, both globally and in the EU, are] changes in land and sea use, direct exploitation of organisms, climate change, pollution and invasive alien species’*.

The roadmap identifies the basis for EU intervention (legal base and subsidiary check) as being: *‘EU-level action is indispensable to address the drivers and consequences of biodiversity loss, many of which are of transboundary nature, such as habitat fragmentation, air and water pollution, the spread of invasive alien species and the effects of climate change on species and habitats’*.

In PAN Europe’s view, the problems identified in this roadmap are too limited, leaving out an ever-increasing amount of scientifically-established causes of the biodiversity decline. It remains clear that the Commission is taking an anthropocentric angle in considering biodiversity protection, while the concept of ‘nature serving humans’ is at the very basis of

¹ https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2019-7908307/feedback/add_en?p_id=6195510

biodiversity collapse. Nature should be protected for what it is. Protecting only the parts we believe we need will inevitably lead to an ever-greater collapse of ecosystem resilience and biodiversity.

This roadmap mentions some of the causes of biodiversity collapse, but fails to name the most important ones. The IPBES report that was mentioned several times clearly points to intensive agricultural practices, through the use of synthetic pesticides, fertilisers and the destruction of habitat (timidly named here ‘habitat fragmentation’) as lead causes for biodiversity collapse. Further, a recent IPCC report² confirmed the dramatic negative impacts of our agricultural practices on biodiversity and climate change.

PAN Europe calls on the European Commission to expand identified problems to include a specific reference to our intensive European model of farming.

Dropping agrochemicals and restoring habitats is of major importance to counter the collapse of biodiversity. Transforming our agriculture towards a chemical-free and biodiversity-friendly model should be clearly mentioned, considering that agriculture constitutes a significant part of EU territory. Such targets are expected to be included in the EU Farm to Fork strategy as well; however, we wish to recall that pesticide use is a horizontal issue which needs to be tackled through different EU policies by different Directorate Generals, as mentioned clearly in the mission letters from President von der Leyen. Furthermore, in its December 2019 resolution on the EU Pollinator Initiative, the European Parliament underlines that more efforts need to be done to reduce the use of pesticides and restore habitats to support pollinators. In addition, citizens’ support for a different agricultural model is increasing in many areas of the EU, through local, regional or national initiatives or through European Citizens Initiatives such as the “[Save Bees and Farmers](#)” ECI.

PAN Europe calls on the European Commission to add a specific reference to the importance of reducing dependency of pesticides and fertilisers into the upcoming biodiversity Strategy. That would be in line with the missions as identified by the new Commission.

Considering the fact that agricultural land, forests and seas represent the majority of the areas where EU biodiversity should thrive, we firmly oppose the wording ‘to promote the sustainable use of forests, agriculture, (...) ecosystems’. ‘Promotion’ alone is not able to counter biodiversity collapse: it is by putting in place the necessary legislations to completely revise our link to nature and the place of EU citizens in their environment that we will be able to counter and reverse the collapse of biodiversity. If the European Commission wishes to obtain results from its Biodiversity Strategy 2030, we need the institution in charge of this strategy to be able to oppose any EU legislation that is unfavorable to biodiversity.

The way forward is not concentrating EU funding on big machinery which will just create new dependencies. Instead, the way forward is encouraging farmers towards a stepwise approach, finding advanced agronomic practices to strengthen soil health, maintaining/creating landscape features to attract predators of crop pests, pollinators, and encouraging the much-needed ecological transition. It is time to integrate concepts such as redesigning and rewilding the farming system into a holistic agronomic and agricultural

² https://www.ipcc.ch/site/assets/uploads/2019/08/Edited-SPM_Approved_Microsite_FINAL.pdf

approach to start working with nature (rather than against it) along permaculture and agro-ecological lines.

The EU's Common Agricultural Policy is not targeted at assisting farmers neither technically not financially in the ecological transition³.

PAN Europe calls on the European Commission to strongly upgrade its proposal on the reform of the CAP, (Case C-409/13) giving increased attention to the importance of protecting biodiversity and, as a result, increased attention to the potential of improving agronomic practices as a first step.

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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³ <https://www.low-impact-farming.info/cap-eu-policies>